REVISED

DRAFT ENVIRONMENTAL IMPACT REPORT

Salvation Army Divisional Camp and Retreat

P70-379W2, ER 98-14-023, SCH No. 2000031058

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COUNTY OF SAN DIEGO

Department of Planning and Land Use

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April 2008

SALVATION ARMY DIVISIONAL CAMP AND RETREAT REVISED DRAFT EIR

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List of Technical Appendices

The following technical appendices are provided as part of the RDEIR. No other technical reports have changed since the February 2005 DEIR; therefore, they have not been reproduced in this RDEIR.

B. *Salvation Army Camp and Retreat Biological Report*
(prepared by Merkel & Associates)
(Bound Under Separate Cover)

J *Fire Protection Plan*
(Prepared by Dudek)
(Bound with RDEIR)

K Fire Service Letters
(Bound with RDEIR)

I.0 INTRODUCTION

Overview

Pursuant to the California Environmental Quality Act (CEQA) Guidelines §15088.5, this document constitutes the Revised Draft Environmental Impact Report (RDEIR) for the proposed Salvation Army Divisional Camp and Retreat project located in the community of Ramona, County of San Diego. CEQA Guideline §15088.5(a) requires that:

> "A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification."

CEQA Guidelines §15088.5 (a)(1) through (a)(4) provide guidance as to what constitutes "significant new information", and is discussed in further detail below.

I.1 Background

In February 2005, the County of San Diego Department of Planning and Land Use (DPLU) published the Salvation Army Divisional Camp and Retreat Draft Environmental Impact Report (DEIR) (SCH#2000031058, County DPLU Case #'s ER98-14-023, P70-379W2). The DEIR was circulated for public review and comment for a period of 45 days ending on March 28, 2005. During the course of the DEIR public review period, 16 written comment letters were received regarding the content and adequacy of the DEIR. The County DPLU reviewed these comments and determined that additional analysis was warranted with respect to fire protection and biological resources in order to adequately respond to written comments received on the DEIR.

I.2 Decision

The County of San Diego DPLU has determined that significant new information has been added to the Draft EIR since public notice was given of the availability of the Draft EIR for public review, and therefore recirculation of portions of the Draft EIR is required pursuant to CEQA Guidelines §15088.5.

I.3 Explanation

The following provides a description of the significant new information that has been added to the EIR subsequent to the public notice of availability of the DEIR provided on February 10, 2005.

1. 2005 Draft EIR "Preferred Project" No Longer Under Consideration. The DEIR assessed the potential environmental impacts of implementing the "Preferred Project," which would expand the camp and retreat facilities to accommodate a maximum of 748 users (DEIR Chapter 1 – Project Description, Location and Environmental Setting). However, the DEIR analysis identified significant and unmitigated impacts associated with the "Preferred Project" related to conflicts with the MSCP (Biological Resources) and the General Plan Conservation Element (Land Use). Because there are alternatives to the "Preferred Project" that can avoid these unmitigated impacts, Reduced Project Alternative I is the project that will be

carried forward to the decision makers for consideration (2005 DEIR pages 5-3, 5-4, 4-5, 4-6, 4-7). RDEIR Figure I-1 depicts the Reduced Project Alternative I site plan.

The Reduced Alternative I would reduce the Education Camp and Multi-Purpose Building. This alternative would also reduce the retreat component and eliminate the yurt camp and a presentation area. Overall, Alternative I would reduce the project building footprint, as proposed in the DEIR, by 11,150 square feet, would reduce the vegetation impacts by approximately nine acres, and would accommodate a maximum of 615 users (an overall camp capacity reduction of 133 users when compared to the proposed project).

2. Modification of Staff Housing Component of Site Plan. The proposed staff housing component of the site plan has been modified (referred to as Area 1, DEIR Figures 1-5 and 1-6). In responding to the public comments on the DEIR, the previously proposed location of two staff housing buildings was changed to ensure that the 25-foot buffer from previously identified County Resource Protection Ordinance (RPO) wetlands would be maintained in that portion of the project site. This change amounts to a slight shift (approximately 25 feet) to the east of the two buildings. However, subsequent to this modification, the County adopted an amended RPO, which removed the affected drainages as RPO wetlands, essentially negating the need for the project modification. However, this configuration has been maintained as no additional impact would result from this change as the buildings would be relocated within an area already assumed as impacted in the DEIR under Reduced Project Alternative I. RDEIR Figure I-1 depicts the location of the Staff Housing Component subject to this change. These buildings are labeled "6" on the site plan.

3. Open Space Easement. In response to a written comment submitted on the 2005 Draft EIR by the Endangered Habitats League (dated February 14, 2005), the project's previously proposed open space easement has been substantially increased and reconfigured. As previously proposed, the open space easement constituted 109 acres. As currently proposed, the open space easement constitutes 278.80 acres, a net increase of 169.8 acres of preserved lands. In order to comply with the County's Biological Mitigation Ordinance (BMO) Preserve Design Criteria (goals and criteria #4), the project's proposed open space easement has been revised to increase the amount of preserved area and decrease the amount of edge, and provide greater connectivity through the project site and with off-site preserve lands (thereby reducing non-preserve edge). The revised open space configuration creates more significant blocks of preserved habitat to reduce edge effects and to maximize the ratio of the area to the perimeter of conserved habitats, while providing connectivity with off-site preserved lands, ensuring compliance with the MSCP Preserve Design Criteria. The revised open space configuration maximizes the habitat structural diversity of conserved habitat areas. This revised easement configuration also conserves more habitat than is required for habitat-based mitigation, resulting in a net preservation gain over development. The previously proposed and revised open space configurations are depicted in RDEIR Figure I-2.

4. County Amended Resource Protection Ordinance (RPO). In March 2007, the County of San Diego Board of Supervisors approved a revision to the 1991 County of San Diego RPO. Part of the revision included a redefinition of "wetlands" and changes to the wetland buffering (i.e., setback) requirements.

The revised definition of a wetland is less inclusive than the 1991 RPO definition. As a result, some areas of the project site that were previously delineated in the DEIR as County RPO jurisdictional wetlands no longer qualify as RPO wetlands and therefore are no longer subject to the RPO development restrictions within wetlands and wetland buffers. However, no changes to the proposed project were made in response to the reclassification of wetland on the project site. RDEIR Figure I-3 depicts the wetlands on the project site and the locations where the classifications have changed since the DEIR as a result of the amended RPO. The drainages that were previously considered RPO wetlands, but do not qualify as RPO wetlands under the new ordinance are shown in red on Figure I-3.

5. Salvation Army Divisional Camp Conceptual Fire Protection Plan. Articles 86 and 86-A of the California Fire Code require that a Fire Protection Plan (FPP) be prepared for new development located in the wildland/urban interface. The County of San Diego has also adopted Article 86 of the California Fire Code. In addition, the Ramona Municipal Water District (RMWD) submitted a written comment letter on the DEIR (March 23, 2005) that required, as an additional condition to mitigate for fire hazards, a secondary emergency access be provided onto Dos Picos Park Road or Highway 67. Although County Fire Code section 96.1.503.1.2 (effective January 30, 2008) requires the proposed project to have a secondary emergency access, Appendix Chapter 1, section 104.8 of the code allows modification of the code requirements for individual projects under certain circumstances. In response to the adoption of Article 86 and the RMWD's position that a secondary emergency access be provided, a FPP was prepared for the project and is included in the RDEIR.

The FPP memorializes the fire safety requirements of the Fire Authority(ies) Having Jurisdiction (FAHJ) over the project – the Ramona Fire Department and the San Diego County DPLU Fire Marshals. The FPP includes a combined fire protection system designed for structures on the project site. The fire protection system includes, but is not limited to, customized fuel modification zones; enhanced, ignition-resistant construction; a 260,000-gallon water tank and pipeline improvements; interior sprinklers; and other infrastructure improvements. Because the "Preferred Alternative" as analyzed in the DEIR was determined by DPLU to be unapprovable due to unmitigable impacts, the FPP is based on the site plan for Alternative I.

A key component of the fire protection planning for the site is the fire behavior modeling, which determines predicted flame lengths and corresponding fuel modification requirements. Figure I-4 of the RDEIR depicts the FlamMap Fire Behavior Exhibit modeled for the project site, and includes the newly proposed fuel modification zones.

6. Increased Biological Impacts Associated with Alternative I. The newly proposed fuel modification zones identified in the FPP expanded the vegetation clearing requirements at several locations, from what was previously assumed in the DEIR. As such, this expansion has increased the vegetation impacts for Alternatives I and II, as were originally analyzed in the DEIR. However, because only Alternative I is being carried forward, the overall impacts associated with this alternative still remain less, even with the expanded fuel modification zones, than would occur under the proposed project as analyzed in the DEIR. Figure I-5 depicts the areas of increased impacts as a result of the recommended fuel modification zones identified in the FPP. These areas are shown in red hatching on Figure I-5.

I.4 Content of the Revised DEIR (RDEIR)/ Summary of Revisions

Consistent with the requirements of Section 15088.5(c) of the State CEQA Guidelines, this RDEIR contains those sections of the DEIR where significant new information is provided, as well as additional errata pages where only minor changes have been made. The following section summarizes the revisions made to the DEIR. The revised sections include *S.O Summary; 1.0 Project Description and Environmental Setting; 2.2 Biological Resources; 2.3 Hazards and Hazardous Materials; 2.7 Land Use/Planning; 3.0 Cumulative Impacts; 4.0 Project Alternatives; 6.0 Environmental Effects Found Not to Be Significant; 7.0 List of References; 8.0 List of EIR Preparers and Persons and Organizations Contacted; and, 9.0 List of Mitigation Measures and Environmental Design Considerations*.

S.O Summary. The Summary has been revised to reflect the revised Mitigation Measure 2.3.b regarding Hazards and Hazardous Materials as discussed in detail in Section *2.3 Hazards and Hazardous Materials*. Also, Mitigation Measure 2.2.c regarding Biological Resources was modified to reflect the revised upland and wetland impacts and required mitigation. Mitigation Measure 2.2.f & g was modified to reflect the increase in the proposed open space configuration.

1.0 Project Description and Environmental Setting. The *Project Description and Environmental Setting* section has been modified in the RDEIR to reflect the characteristics of Alternative I.

2.2 Biological Resources. Section 2.2 Biological Resources has been revised to reflect the County's recently amended Resource Protection Ordinance. The amended RPO language affects primarily the discussion and analysis of wetlands on-site. The discussion of Wildlife Corridors was amended in responses to public comments on the DEIR. Impacted wetland acreages were modified based on the change in characterization of wetlands on-site as a result of the amended RPO. Impacted upland acreages were modified based on the increased fuel management zone requirements. Mitigation measures 2.2c, 2.2d&e, and 2.2f&g were modified to reflect the revised wetland and upland impacts. Also, Mitigation Measure 2.2.f & g was modified to reflect the increase in the proposed open space configuration. Table 2.2-1 was modified to reflect the revised wetland impacts and required mitigation. Table 2.2-2 was modified to reflect the revised BMO required mitigation and open space constituents.

2.3 Hazards and Hazardous Materials. Section 2.3 Hazards and Hazardous Materials has been revised to incorporate information from the Fire Protection Plan that has been prepared for the Salvation Army Divisional Camp and Retreat (based on the site layout for Alternative I). Mitigation Measure 2.3.b of the DEIR included required content for the future FPP. The measures required by Mitigation Measure 2.3.b were incorporated into the FPP. Mitigation Measure 2.3.b has been amended to require that the recommendations and measures identified in the Fire Protection Plan be implemented at the project site.

Section 2.3 Hazards and Hazardous Materials has also been revised to include a detailed analysis of the infeasibility of providing a secondary emergency access to/from the project site via SR-67, and also includes an analysis of the potential impacts to Mussey Grade Road under an emergency evacuation scenario.

2.7 Land Use/Planning. An errata to *Section 2.7 Land Use/Planning* has been provided that incorporates reference to the Fire Protection Plan into the description of the project's consistency with Goal I of the Open Space Element and Public Safety Element goal of the County General Plan, Policy/Recommendation 18 of the Community Character Element, and the Open Space goal of the Ramona Community Plan.

3.0 Cumulative Impacts. An errata to *Section 3.0 Cumulative Impacts* has been provided that incorporates reference to the changes regarding the Fire Protection Plan into the cumulative Hazards and Hazardous Materials discussion.

4.0 Project Alternatives. An errata to *Section 4.0 Project Alternatives* has been provided that incorporates references to the changes regarding biological resources and hazards and hazardous materials impacts as a result of the amended Resource Protection Ordinance and the new Fire Protection Plan.

6.0 Environmental Effects Found Not to Be Significant. An errata to *Section 6.0 Environmental Effects Found Not to be Significant* has been provided that incorporates a discussion of the Fire Protection Plan prepared for the Salvation Army Divisional Camp and Retreat. This discussion has been incorporated into the Fire Protection section of the Public Services discussion of *Section 6.0 Environmental Effects Found Not to be Significant*.

7.0 List of References. Section 7.0 List of References has been updated to include the revised Biological Resources Report and the Fire Protection Plan.

8.0 List of EIRs Preparers and Persons and Organizations Contacted. Section 8.0 List of EIR Preparers and Persons and Organizations Contacted has been updated to include additional Preparers and Persons and Organizations Contacted.

9.0 List of Mitigation Measures and Environmental Design Considerations. Section 9.0 List of Mitigation Measures and Environmental Design Considerations has been revised to reflect the revised Mitigation Measure 2.3.b regarding Hazards and Hazardous Materials as discussed in detail in *2.3 Hazards and Hazardous Materials*. The Hazards and Hazardous Materials discussion of the Design Considerations was revised to incorporate discussion of the Fire Protection Plan, prepared for the Salvation Army Divisional Camp and Retreat, based on the site layout described in Alternative I. Also, Mitigation Measure 2.2.c and 2.2d&e were modified to reflect the revised wetland and upland impacts. Mitigation Measure 2.2.f & g was modified to reflect the increase in the proposed open space configuration.

Appendix B – Salvation Army Camp and Retreat Biological Report. The biology report has been updated to reflect the County's recently amended Resource Protection Ordinance, revised upland and wetland impacts, and expanded open space configuration.

Appendix J – Fire Protection Plan. A Fire Protection Plan (FPP) has been prepared for the Salvation Army Divisional Camp and Retreat, based on the site layout described in Alternative I. The purpose of the FPP is to generate and memorialize fire safety requirements that will provide a reduced level of risk for the

Camp and its visitors and achieve the Same Practical Effect in lieu of a secondary emergency access. The FPP identifies the fire risk associated with the proposed expansion land uses (as identified in MUP P70-379W2) and identifies requirements for water supply, fuel modification, access, building ignition and fire resistance, fire protection systems, defensible space, vegetation management, and emergency procedures, among other pertinent criteria for fire protection.

I.5 Relation to DEIR

Pursuant to procedures set forth in CEQA Guidelines Section 15088.5(f)(2), reviewers are requested to limit their comments to the materials contained in this RDEIR. The County will prepare written responses to: (1) comments received during the initial DEIR circulation period (February, 2005) that relate to chapters or portions of the document that were not revised and recirculated, and (2) comments received during this recirculation period that relate to the chapters or portions of the earlier DEIR that have been revised and recirculated in this document.

Consistent with the requirements of CEQA Guidelines Section 15087, this RDEIR is being made available for public review on April 25, 2008, for a period of 45 days. The public review period ends on June 9, 2008. During this period, the general public, agencies, and organizations may submit written comments on the RDEIR to the lead agency. Pursuant to procedures set forth in CEQA Guidelines Section 15088.5(d), the County has sent a Notice of Availability, to all organizations and members of the public who were on the County's distribution list for the DEIR, and to any additional persons or organizations that have requested copies of the DEIR.

Copies of this RDEIR are available for review at:

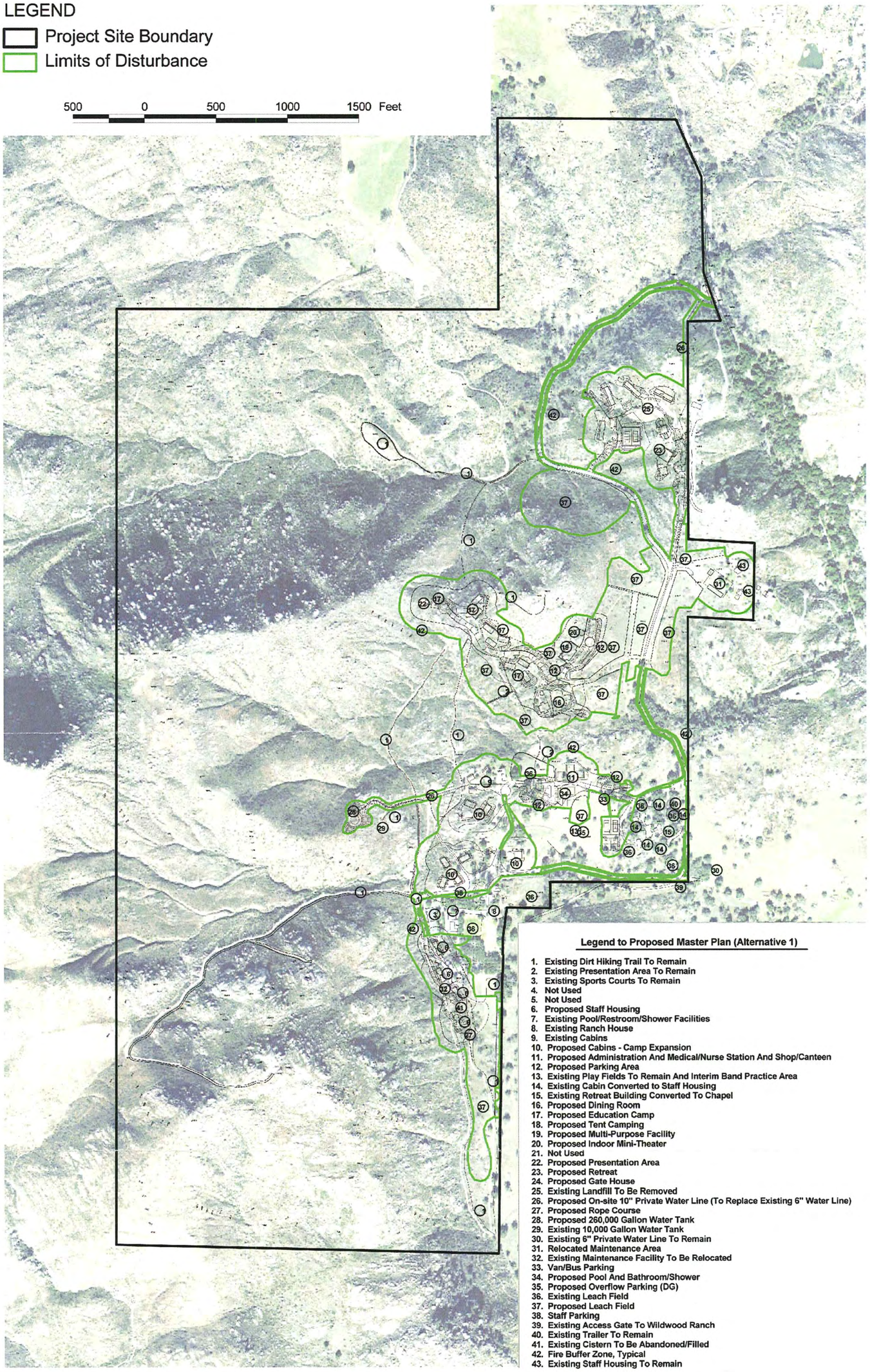
County of San Diego Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Ramona Public Library
1406 Montecito Road
Ramona, CA 92065

All written comments on this RDEIR should be addressed to:

Kristin Blackson
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

After close of the comment period, the County will consider all comments received on this RDEIR, prepare responses as required, and prepare the Final EIR. The Final EIR, which will consist of the DEIR, the RDEIR, and comments and responses related to the DEIR and RDEIR, will be considered by the Board of Supervisors for certification. Following certification of the EIR, the Board of Supervisors will consider the proposed project for approval.



SOURCE: Merkel, 2008

01/09/08

BRG CONSULTING, INC.

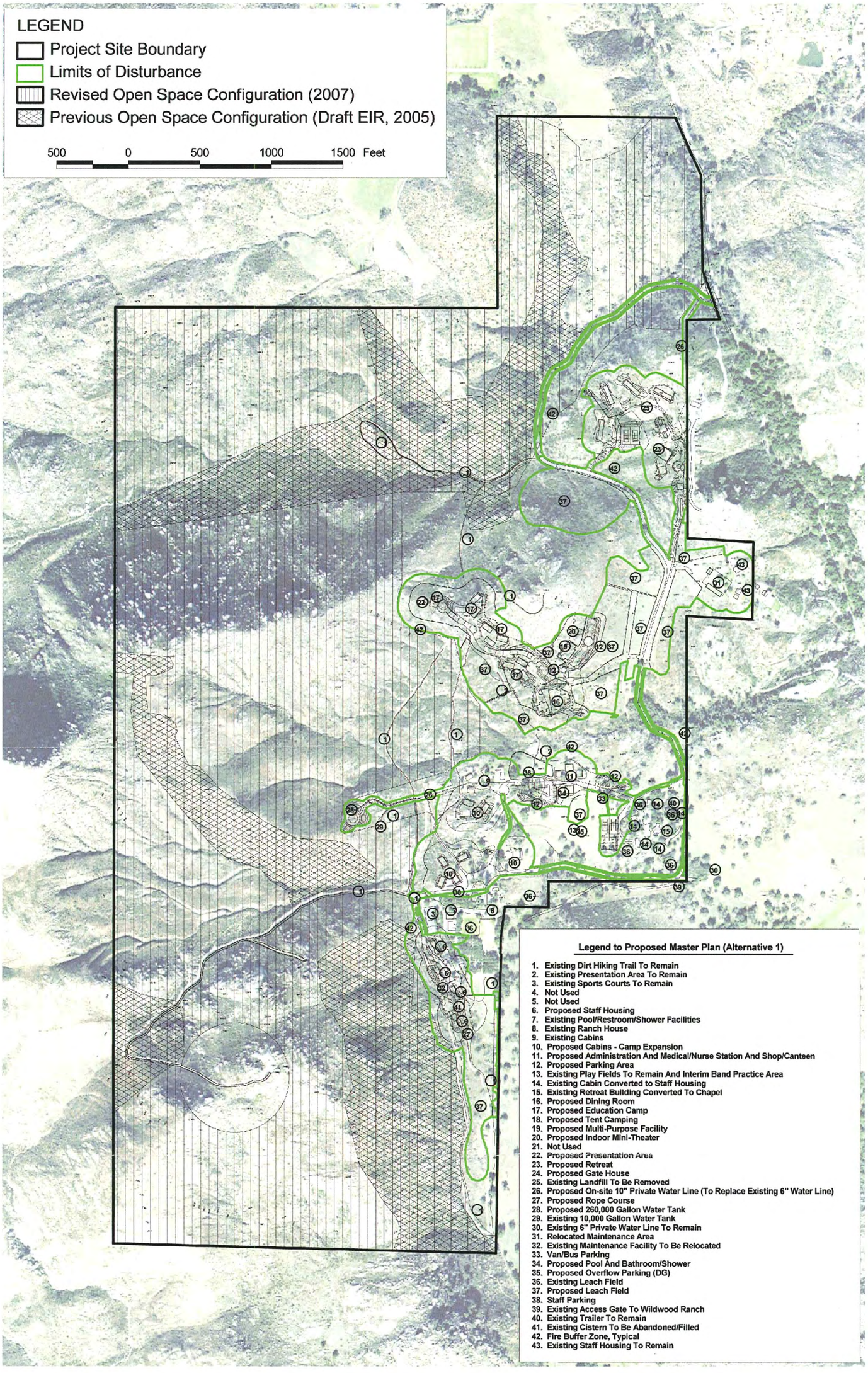
Salvation Army Divisional Camp and Retreat

Limits of Disturbance

FIGURE

I-1

F:\projects\920_salvation_army\maps\GIS\fig 1 Limits of Disturb.mxd



SOURCE: Merkel, 2008

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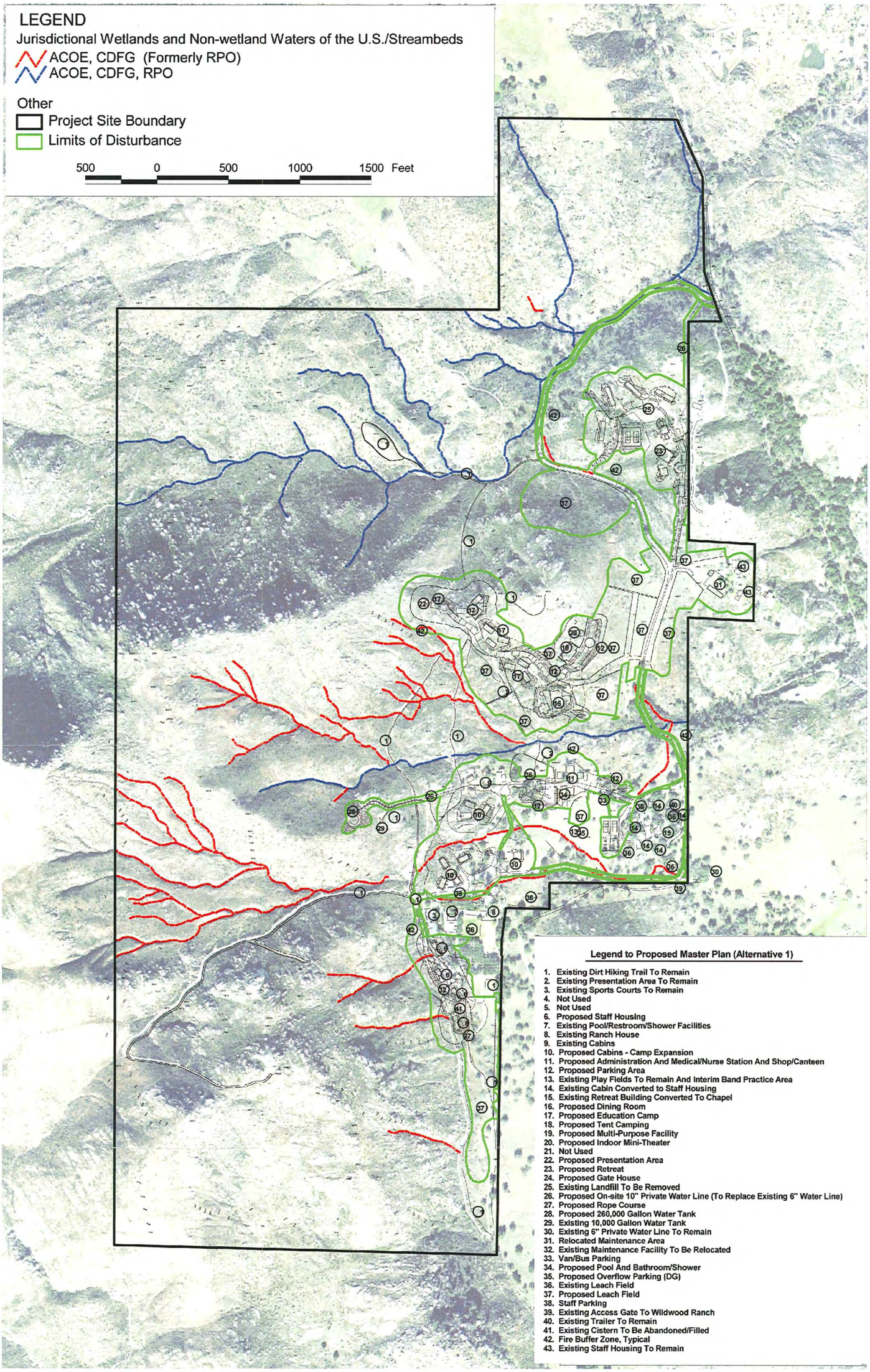
BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Openspace Configurations

FIGURE I-2

F:\projects\920_salvation_army\maps\GIS\fig 2 Open Space config.mxd



I-11

SOURCE: Merkel, 2008

01/09/08

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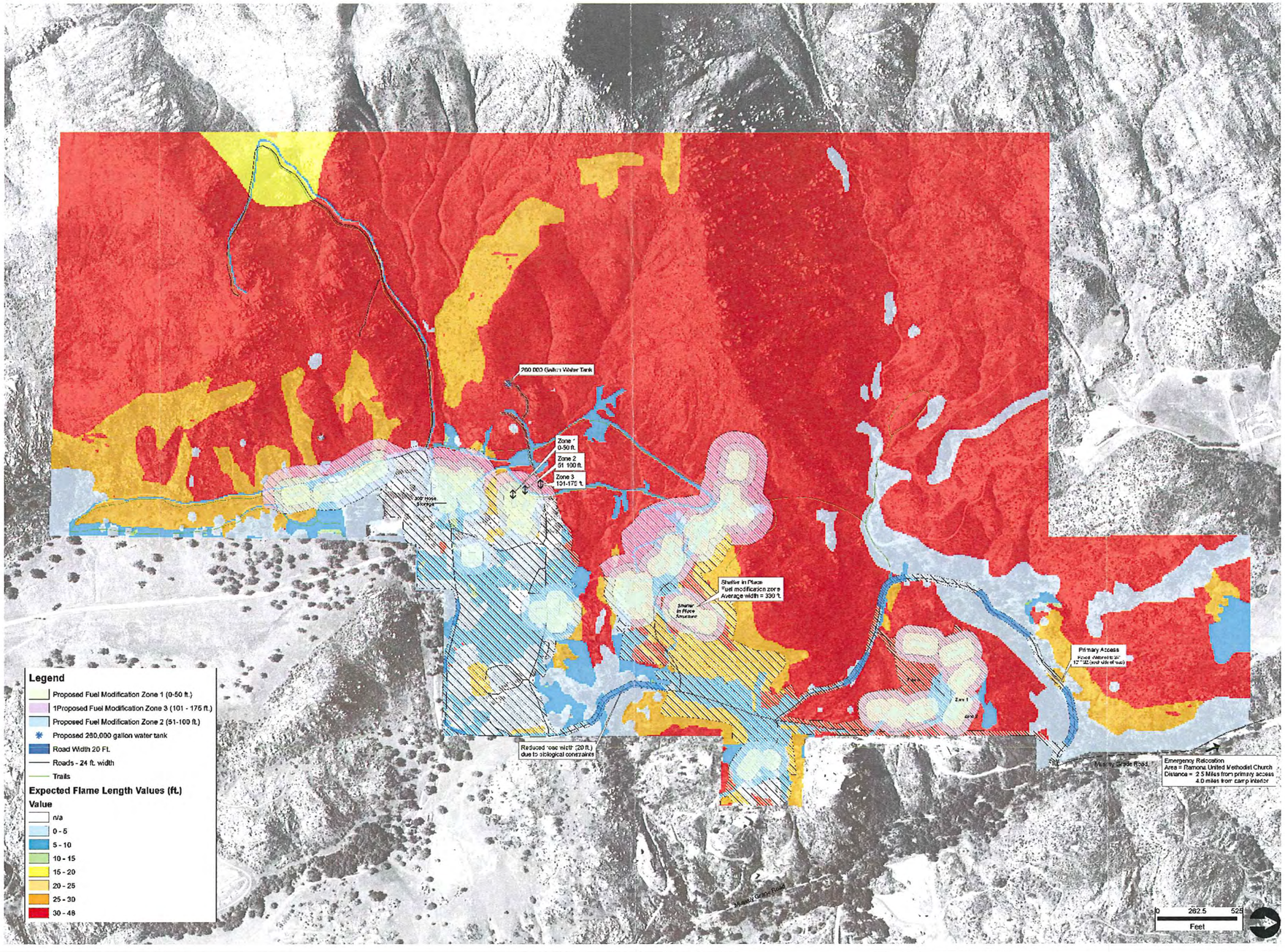
Salvation Army Divisional Camp and Retreat

Jurisdictional Wetlands and Non-Wetland Waters of the U.S.

FIGURE I-3

F:\projects\920_salvation_army\maps\GIS\fig 3 Wetlands.mxd



SOURCE: Dudek, 2008

01/10/08

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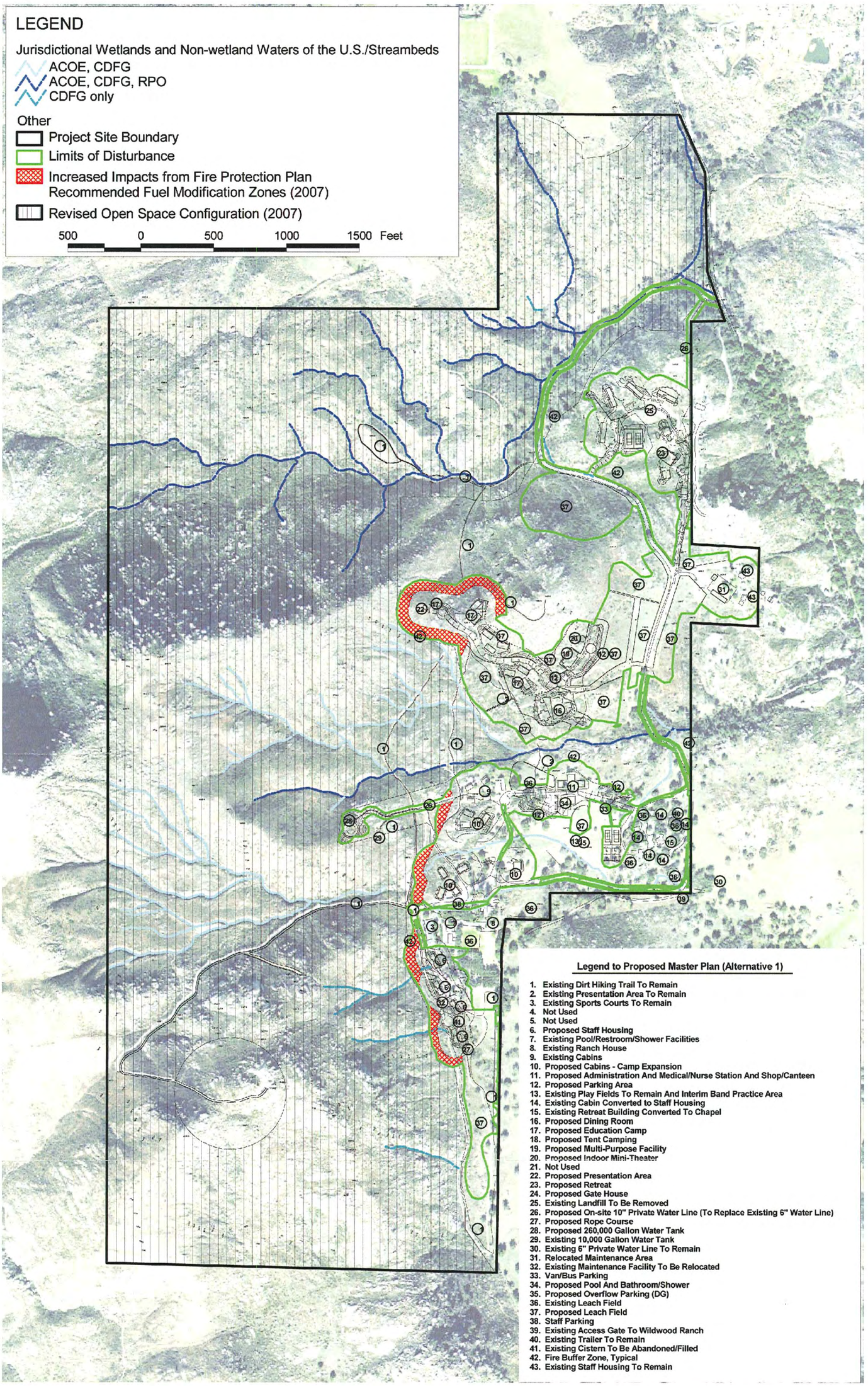
Salvation Army Divisional Camp and Retreat

Fire Behavior Exhibit

FIGURE
I-4

F:\projects\920_salvation_army\maps\GIS\fig 4 fire mods.mxd



SOURCE: Merkel, 2008

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BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Recommended Fuel Modification Zones

FIGURE I-5

F:\projects\920_salvation_army\maps\GIS\fig 5 fuel Mod Zones.mxd

Revised Draft Environmental Impact Report (RDEIR)

S.0 SUMMARY

The Summary has been revised to reflect the revised Mitigation Measure 2.3.b regarding Hazards and Hazardous Materials as discussed in detail in *Section 2.3 Hazards and Hazardous Materials*. Also, Mitigation Measure 2.2.c regarding biological resources was modified to reflect the revised upland and wetland impacts and required mitigation. Mitigation Measure 2.2.f & g was modified to reflect the increase in the proposed open space configuration.

TABLE S-1
Summary of Significant Impacts and Mitigation Measures

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 2.2 - Biological Resources		
Impact 2.2.a The proposed project would impact 2.00 acres of Southern Coast Live Oak Riparian Forest. Approximately 0.04 acre of this impact would result from implementation of the Retreat Center and access road. Impact 2.2.b The proposed project would impact 7.29 acres of Coast Live Oak Woodlands. Approximately 0.44 acre of this total would result from implementation of the proposed Retreat Center and access road.	MM 2.2.a and MM 2.2.b Within the proposed dedicated open space easement, 18.89 acres of oak woodland (15.05 acres Southern Coast Live Oak Riparian Forest, and 3.84 acres Coast Live Oak Woodland) shall be preserved.	Not Significant.
Impact 2.2.c Significant biological impacts to 0.17~~14~~ acre of ACOE Non-wetland Waters of the U.S. that are County-jurisdictional (RPO) wetlands.	MM 2.2.c Within the proposed dedicated open space easement in the northern portion of the site within the Non-Native Grassland habitat adjacent to riparian areas associated with the West Fork of the San Vicente Creek, 0.39~~36~~ acre of wetland habitat shall be created in accordance with a wetland restoration plan approved by the County.	Not Significant.
Impact 2.2.d Significant biological impacts to 13.12 acres of Diegan Coastal Sage Scrub. Impact 2.2.e Significant biological impacts to 9.26 acres of Coastal Sage-Chaparral Scrub	MM 2.2.d & e Within the proposed dedicated open space easement 35.36~~54~~ acres of sage scrub (6.46 acres of Mafic Southern Mixed Chaparral [a Tier I habitat], 0.05~~01~~ acre of Diegan Coastal Sage Scrub, and ~~29.07~~28.85 acres of Coastal Sage-Chaparral Scrub) shall be preserved.	Not Significant.

TABLE S-1
Summary of Significant Impacts and Mitigation Measures

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 2.2 - Biological Resources (cont'd.)		
Impact 2.2.f Significant biological impacts to 37.36 acres of Southern Mixed Chaparral. Impact 2.2.g Significant biological impacts to 12.45~~33~~ acres of Non-native Grasslands.	MM 2.2.f & g Within the proposed dedicated open space easement, ~~53.61~~223.42 acres of Tier III habitat (~~53.25~~223.19 acres of Southern Mixed Chaparral and 0.23~~36~~ acre of Non-native Grassland) shall be preserved.	Not Significant.
Impact 2.2h Significant direct and indirect biological impacts to 38 Engelmann Oaks.	MM 2.2.h Engelmann Oaks (Group D) shall be preserved through on-site preservation of oak woodlands in the proposed dedicated open space easement.	Not Significant.
Impact 2.2.i Significant indirect biological impacts to the California ~~Gnatchatcher~~Gnatcatcher.	MM 2.2.i Construction activities shall be prohibited during the California gnatcatcher breeding season (March 1 - July 1) unless nest monitoring is conducted by a qualified biologist and results indicated the absence of active nests or the completion of the breeding season.	Not Significant.
Impact 2.2.j Significant indirect biological impacts to nesting raptors within 300 feet of the construction footprint, if construction were to occur between February 15 and June 1.	MM 2.2.j Prior to construction within 300 feet of potential raptor nesting habitat (i.e., riparian or woodland habitat) to be conducted during the raptor breeding season (February 15 through June 1), the area within 300 feet of the construction footprint shall be surveyed for the presence of nesting raptors. If active nests are present, construction within 300 feet of the active nest will be delayed until the ~~conclusion of the breeding season~~ nest is abandoned.	Not Significant.
Impact 2.2.k Significant conflict with the MSCP Subarea Plan Conformance Findings regarding edge effects.	MM 2.2.k No mitigation proposed.	Not Significant.

TABLE S-1
Summary of Significant Impacts and Mitigation Measures

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 2.2 - Biological Resources (cont'd.)		
Impact 2.2.l Significant conflict with the BMO requirement that wetland impacts in BRCAs be avoided to the maximum extent practicable by using design criteria that include locating development in areas that minimize impacts to habitat.	MM 2.2.l No mitigation proposed.	Not Significant.
Impact 2.2.m Significant conflict with the BMO requirement that Diegan Coastal Sage Scrub and Coastal Sage-Chaparral Scrub impacts in BRCAs to be avoided to the maximum extent practicable by using design criteria that include locating development in areas that minimize impacts to habitat.	MM 2.2.m No mitigation proposed.	Not Significant.
Impact 2.2.n Significant conflict with BMO design criteria for corridors.	MM 2.2.n No mitigation proposed.	Not Significant.
Impact 2.2.o Significant conflict with the RPO regarding protection of sensitive habitats (corridor).	MM 2.2.o No mitigation proposed.	Not Significant.
Impact 2.2.p Significant conflict with the RPO regarding protection of sensitive habitats (wetlands)	MM 2.2.p No mitigation proposed.	Not Significant.

TABLE S-1
Summary of Significant Impacts and Mitigation Measures

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 2.3 – Hazards and Hazardous Materials		
Impact 2.3.a Significant soil impacts from the above-ground fuel storage tanks.	MM 2.3.a Removal of the two above-ground fuel storage tanks shall comply with all applicable federal, state and local regulations. Any necessary permits shall be obtained prior to removal and relocation. An amendment to the Business Plan shall be approved prior to relocation of the above-ground storage tanks. ~~A preliminary Phase I~~ An Environmental Site Assessment (ESA) will be performed to test for potential soil contamination from the tanks in the existing maintenance yard. The Salvation Army will follow all recommended remediation measures outlined in the ~~Phase I~~ ESA. In addition, the Salvation Army will consult with the Ramona Fire Department prior to relocating the tanks for appropriate approval of the new tank location (pers. comm. Delgadillo, S. Ramona Fire Department, April 2000). The new tank location shall be limited to existing developed areas within the project site. The relocated tanks shall be UL-2085 tanks as required by code.	Not Significant.
Impact 2.3.b Significant hazards and hazardous materials impact due to an increase in the number of people that could be exposed to a wildland fire.	MM 2.3.b The Fire Protection measures and requirements, as identified in the Salvation Army Divisional Camp Fire Protection Plan (Dudek, October 2008) shall be implemented. The following conditions shall be included in the Major Use Permit to mitigate for Hazards and Public Safety impacts related to potential fires in the project area. • The Ramona Fire Department determined that a 260,000-gallon water tank at an elevation of approximately 1,665 MSL with a ten-inch on-site water line that connects to the existing six-inch water main in Mussey Grade Road will meet fire flow requirements for the project and will also enhance the flow capacity to fight future fires in the project area. Prior issuance of building permits, the applicant shall submit to the County, plans approved by the Ramona Municipal Water District Engineering Department for a water system capable of handling the fire flow requirements for the project (existing and proposed buildings). • Prior to the issuance of building permits the appropriate number of fire hydrants and their specific locations, approved by the ~~Ramona Fire Department~~RMWD, will be identified and constructed.	Not Significant.

TABLE S-1
Summary of Significant Impacts and Mitigation Measures

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 2.3 – Hazards and Hazardous Materials		
	• Automatic sprinklers shall be installed in all existing and new buildings, consistent with the Ramona Fire Code Ordinance 99-199. This shall be ~~determined after~~ verified when the water system plans are approved. • With the exception of the fire access roads designated as "existing access road to remain, road not to be paved," (item #4), and the roads depicted as "existing road width to remain, road to be paved," as shown on the "Fire Marshal Exhibit: Proposed Site Plan," dated 1/15/02, and revised 4/18/02, and 5/1/02 (Appendix H), all other existing fire access roadways, and all new fire access roadways from Mussey Grade Road leading into and within the project shall be improved to a width of a minimum 24 feet of paved surfacing. As illustrated in this exhibit some areas will not be widened to 24 feet in order to avoid impacts to sensitive biological resources. • A lighted map directory shall be provided at every intersection within the proposed project denoting, with numbers, the areas on-site that the particular road leads to. • "No Parking Fire Lane" signs shall be posted on all roads that have the fire department required width of 24 feet. The number of signs and their placement shall be determined by the Ramona Fire Department. • A fuel modification zone a minimum of 100 feet in width will be provided around the entire perimeter of each building site, as depicted on the site plan, consistent with Ramona Fire Code Ordinance 99-199. • A ten-foot wide fuel modification zone shall ~~occur~~ be provided along each side of all fire access roadways. • The following are exceptions to the fuel modification requirements above ~~are granted per the Fire Code~~: - Single specimens of trees, ornamental shrubbery or similar plants used as ground covers, provided that they do not form a means of rapidly transmitting fire from the native growth to any structure.	

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 2.3 – Hazards and Hazardous Materials (cont'd.)		
	MM 2.3.b (cont'd.) - Grass and other vegetation located more than 30 feet from buildings or structures and less than 18 inches (457 mm) in height above the ground need not be removed where necessary to stabilize the soil and prevent erosion. - With the approval of the FAHJ, the width of the fuel modification zone may be reduced where fire-resistive structures or other features are constructed. However, in no case shall the fuel modification zone cannot be reduced to less than 30 feet. • Prior to issuance of building permits, a fire alarm system shall be provided. • A response map update in a format compatible with current department mapping shall be provided, as specified in the Ramona Fire Code Ordinance 99-199. • The Salvation Army shall, at all times, have two large capacity school buses with drivers or other equivalent vans or buses on the premises at all times when children are attending camp. • The Salvation Army shall prepare a fire evacuation/fire drill plan for the camp and conduct a fire drill the first day of every camp period. The plan will establish scheduled drop points for the occupants to facilitate complete evacuation. • The ~~Ramona Fire Department~~RMWD has agreed to~~, and shall~~ observe an annual fire evacuation/fire drill exercise to ensure proper safety measures have been implemented. After this annual observation and review, the ~~fire department~~RMWD may require more than two large capacity school buses with drivers to be available at the camp for evacuation purposes. To protect family or adult campers who were transported to the camp by bus or van, the ~~Ramona Fire Department~~RMWD may also require one or more additional buses with drivers to be available to evacuate the campers or may require other protective measures. ~~• The yurts will have skirting installed in a manner similar to skirting on trailer or mobile homes.~~	

Source: BRG Consulting, Inc., 2008

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1.0 PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

The *Project Description and Environmental Setting* section has been included in the RDEIR to allow the reader the ability to reference the project that was under consideration in the previously circulated 2005 public review Draft EIR. However, the Preferred Alternative, as analyzed in the 2005 Draft EIR has been deemed unapprovable as it does not comply with some existing County ordinances. The Reduced Project Alternative I or Reduced Alternative II will remain under consideration.

1.1 Revised Project Description – Reduced Alternative I and II

Reduced Project Alternative I or Reduced Project Alternative II would reduce or avoid significant impacts to a greater extent than the Preferred Alternative that was analyzed in the DEIR. These alternatives would meet all the objectives of the Preferred Alternative, with the exception of one project objective. Specifically, locating the Retreat Center in close proximity to the remaining camp facilities conflicts with project objective 4: "Provide a retreat center in a camp-like setting with an atmosphere conducive to personal growth that is physically distinct and isolated from the remainder of the camp facilities." However, the significant and unmitigated impacts associated with the Preferred Alternative, related to conflicts with the MSCP (Biological Resources) and the General Plan Conservation Element (Land Use) would not occur under Alternative I or Alternative II.

1.1.1 Reduced Project Alternative I

The site plan for Alternative I is shown on RDEIR Figure I-1. All components would be the same as the preferred project with the following exceptions. Under Reduced Project Alternative I, the Retreat Center would be decreased by one 16-unit cabin and the gatehouse would be eliminated (31 campers; 9,200 square feet). Under this alternative, the Retreat Center would be relocated to the south of its proposed location under the proposed project, nearer to the other camp facilities. This alternative does not include the Expanded and Relocated Tent Camping Component, which under the proposed project would include a total of ten yurts (a reduction of 90 users), a restroom/shower building, outdoor seating for light eating and an outdoor presentation area constructed of elevated wood logs for seating (1,950 total square feet). The proportionate reduction in staff necessary for this alternative would be 12 people. Implementation of the Reduced Project Alternative I would reduce the capacity of the camp by 133 users for an overall camp capacity of 615 users and would decrease the total project building footprint by 11,150 square feet. The overall vegetation impact would be reduced by approximately nine acres. The Fire Protection Plan (FPP) prepared for the Salvation Army Division Camp and Retreat is based on Alternative I.

1.1.2 Reduced Project Alternative II

Under the Reduced Project Alternative II, all components would be the same as the proposed project with the following exceptions. Under Reduced Project Alternative II, the Retreat Center would be decreased by one 16-unit and one 18-unit cabin and the gate house would be eliminated (67 campers;

19,200 square feet). The Retreat Center would be relocated nearer to the other camp facilities, similar to Reduced Project Alternative I. This alternative, similar to Reduced Project Alternative I, also eliminates the Expanded and Relocated Tent Camping Component which, under the proposed project, would include a total of 10 yurts (a reduction of 90 users), a restroom/shower building, outdoor seating for light eating and an outdoor presentation area constructed of elevated wood logs for seating (1,950 total square foot reduction). Reduced Alternative II would result in a decrease in the Education Camp by three cabins (66 campers, 9,750 square feet) and a reduction in the size of the Multi-Purpose Building by 9,000 square feet, resulting in a maximum capacity of the building of 500, down 100 from the proposed project. The proportionate reduction in staff necessary for this alternative would be 12 people. Implementation of Reduced Alternative II would reduce the calculated capacity of the camp by 235 overnight users compared to the proposed project for an overall camp capacity of 513 users and would decrease the total project building footprint by 39,900 square feet.

The Project Description for the Preferred Alternative, as analyzed in the 2005 Draft EIR, is replicated on the following pages.

~~1.0 PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING~~

1.1 Project Description and Location

The existing Salvation Army Divisional Camp and Retreat is situated on 578 acres located in the southwestern portion of the Ramona Community Planning Area. The existing campground is owned and operated by the Salvation Army, a charitable organization, which purchased the property from the First Presbyterian Church of San Diego in 1997. The current facility has functioned as a camp and retreat center for several decades under existing County Major Use Permit (MUP) P70-379 issued in 1970 and P70-379W1 issued in 1976.

The project site is located at 14488 Mussey Grade Road in the Ramona Community Planning Area, in central San Diego County (Figures 1-1 and 1-2). The property is situated on the western side of Mussey Grade Road, south of State Route 67 (SR-67) and north of the San Vicente Reservoir. It is located in portions of Section 6, Township 14 South, Range 1 West; and Sections 1 and 12, Township 14 South, Range 1 East; San Vicente Reservoir 7.5-Minute USGS Quadrangle, San Bernardino Base Meridian (Figure 1-3).

1.1.1 Project Description

The Salvation Army, since its acquisition of the Sierra del Mar site, has redesigned the project and has reduced the scope of the project on five separate occasions. The Project History Matrix (Table 1-1) outlines the historical context by which the project was reduced (i.e. 25 percent population reduction) and revised over the past three years. The camp was originally planned to have a maximum capacity of 1,000 persons, more buildings than are now planned, a different building configuration, different water supply, a pack bed filter wastewater treatment system, and RV Park, and remote camping improvement and expansion.

The proposed project is envisioned as a low-density, high-quality camping facility. Under the Plan, development will occur in clusters, thereby minimizing landform alteration and disturbance to natural habitat and allowing the vast majority of the site to remain undeveloped. At the end of the 20-year expansion, the camp will accommodate up to a maximum capacity of 748 people (i.e., users, staff and other support personnel).[1]

The proposed project will include the major components described below, as illustrated in Figures 1-4 through 1-11. The identification number for each component described below corresponds to the legend in Figure 1-4.

Cabin Camp (10). This component expands the existing five masonry cabins to a total of 12 cabins. Toilets and showers will be included in each of the cabins. In addition, a building for arts and crafts with separate rest rooms is proposed. At buildout, this component will be approximately 45,000 s.f. (including

[1] Note: The Reduced Project Alternative I would allow a maximum of 615 users.

the existing five cabins) with a maximum capacity of approximately 234 people. The existing uses of camping and activities in a cabin environment for children, young adults, women's and men's groups, seniors, and/or couples groups will be continued and expanded upon. Areas directly surrounding the new cabins will feature native landscaping consisting of oak and sycamore species.

Tent Camp (18)[2]*.* The Tent Camp component expands and relocates six more permanent dome-shaped tent-like structures ("yurts") to a total of ten. In addition, a toilet/shower building for this area is proposed. An outdoor meeting area made of wood logs for seating is also planned. The final buildout of this component will be approximately 7,500 s.f. with a maximum capacity of approximately 90 people.

Nature Study/Educational Camp (17 and 22). Though the study of nature will be a component of the camp as a whole, the Nature Study/Educational Camp will focus on ecological education. In this area, campers will stay in cabins and use nearby classrooms and the adjacent natural areas to learn about the surrounding environment. An eventual buildout of nine cabins with toilets and showers, a building for classrooms, and an outdoor meeting area made of concrete steps for seating are planned for the nature study area. The final buildout of this component will be approximately 35,000 s.f. with a maximum capacity of approximately 198 people.

Staff Housing (6, 14 and 43). The two existing housing buildings currently used to house staff members will remain. The four cabins at the existing area located in the southeastern portion of the camp will be converted to house approximately 17 staff members once the new retreat component is constructed. Four new staff housing buildings in the southeast portion of the camp will house an additional 28 staff members, representing a maximum buildout of approximately 20,000 s.f. The staff housing units will be two-story structures with tiled roofs. Each unit will include wood doors and balconies, as well as masonry walls to match existing cabins on the camp. The areas directly surrounding the new staff housing buildings will feature native landscaping consisting of oak and sycamore species.

Maintenance Facilities (31). The location of the maintenance operation will be moved from its current location in the southeastern portion of the site to a new location at the central-eastern portion of the project site. The existing facility will be demolished, and a new facility constructed. The new facility will consist of a maintenance building of about 3,600 s.f. with an approximately 1,200-s.f. supply building. A six-foot chain link fence will enclose the two buildings, along with a yard area between them, for security purposes. These buildings, and the yard between them, will be visually screened from surrounding areas by a poplar grove and existing oak trees.

Prior to planned development of the site, an existing 0.74-acre landfill and debris pile located in the northeast portion of the site will be excavated and filled (Figure 1-4). The landfill contents have been investigated by County of San Diego personnel and have been determined to be non-hazardous materials. Material will be excavated and transferred to the Ramona landfill. The area will be filled with a County-approved fill material. All removal and fill operations will be performed to County specifications and standards. Additionally, two above-ground diesel and gasoline fuel storage tanks located in the

[2] Note: The Tent Camp Component would be eliminated under the Reduced Project Alternative I.

existing maintenance yard will be re-located to the new maintenance area located near the central-eastern boundary of the site. Such relocation will require application to the County of San Diego Department of Environmental Health and the preparation of a business plan that addresses potential hazards issues.

Support Facilities (11, 16, and 19). A new approximately 21,000 s.f. central dining facility will service the Cabin Camp, Tent Camp, Nature Study/Educational Camp, as well as any day-uses. The maximum capacity of this facility will be approximately 600 people. Housing for two cooks will also be included within this facility.

Additionally, a new approximately 19,500 s.f. multi-purpose building with a capacity of 600 users, will be located in the east-central portion of the camp. Uses of the multi-purpose building will include congregational meetings for large groups using the camp, concerts for the music camp program, and instructional meetings for music and other group activities. The multi-purpose building will also be used for the Salvation Army's Annual Family Camp, which currently has attendances of between 400 and 500 people. An approximately 2,500 s.f. indoor mini-theater will be located adjacent to the multi-purpose building with a maximum capacity of approximately 125 people.

A new central administrative cluster of buildings with a combined maximum square footage of approximately 6,000 is proposed to service the camp. The buildings will house administrative offices, a small infirmary where campers can get medical attention and supplies, and a canteen.

Retreat Center (23)[3]. This retreat includes relocation of the existing retreat program facility located in the southern portion of the camp to the northeastern portion of the site. The existing retreat facility (10,000 s.f.), which has a limited capacity of approximately 48 overnight guests, will be converted to a chapel (15). The new retreat, at eventual buildout, will include five two-story buildings with an overnight maximum capacity of 175 people. Functions will include retreats and conferences for young adults, couples, men's groups, women's groups, seniors, and other compatible users. A building with a flexible meeting room, kitchen and breakout space is also proposed. In addition, two tennis courts, a swimming pool, and a shower/toilet/spa building will provide recreational opportunities for area guests. The maximum buildout of this component will be approximately 57,000 s.f.

Grading for Planning Area 6 would require cut and fill slopes into the adjacent hillside for the Retreat Center access road that ranges between ten to 15 feet with one slope height of 20 feet.

Recreation (27 and 34). The existing open play fields, play courts, and swimming pool will remain. Additional recreation areas will include new tennis and basketball courts, a new swimming pool, a recreational rope course, and a new approximately 2,500-s.f. bathroom/shower building.

[3] Note: Under the Reduced Project Alternative I, the Retreat Center would be relocated and one 16-unit cabin and gate house would be eliminated.

Parking (12, 33 and 38). Parking to support the maximum population on-site would be approximately 188 designated spaces and an additional 112 overflow spaces. The majority of camp users will arrive via buses, vans or car pools. The designated parking areas will be covered with decomposed granite with numerous adjacent shade trees to maintain the rustic feel of the overall camp.

Improved Fire Services and Utilities (4, 26, 28, 29 and 37). Potable water is supplied to the site by an existing six-inch water line in Mussey Grade Road. An existing 10,000-gallon water storage tank located within the existing camp will remain. To increase fire fighting water capacity and flows, a new approximately 260,000-gallon water tank will be added near the existing 10,000-gallon water tank. A new private water line will connect with the existing six-inch water line in Mussey Grade Road at the main site entrance. The line will then transverse the property in private on-site roads located along the eastern property boundary within and bisecting areas proposed for development, terminating at the proposed 260,000-gallon water tank.

In order for the Nature Study/Education Camp to be serviced by the Ramona fire department and the Ramona Municipal Water District (RMWD), a 10.8-acre parcel is proposed for annexation into the RMWD. This parcel is located in the north central portion of the camp property (Figure 1-12).

The existing camp is serviced by a standard septic system with leach fields. The expanded camp will also be serviced by a standard septic system with leach fields. Infiltration basins, grass swales and Best Management Practices (BMPs) will be used to prevent adverse hydrology/water quality impacts. A separate analysis and report has been provided to the Department of Environmental Health (Vinje and Middleton Engineering, Inc., 2001), covering detailed percolation tests and calculations of the proposed system.

An improved fire access road system is incorporated into the project design to support the expanded camp. This system will be comprised of the existing roads as well as new internal private roads, as shown in the proposed Site Plan (Figure 1-4). New roads and those roads proposed for improvements will be paved and widened to 24 feet as discussed in Section 2.3, Hazards and Hazardous Materials.

Additional power and telephone and cable lines will be placed under this road system to avoid additional environmental impacts.

Open Space. In addition to the aforementioned camp components, approximately ~~109~~ 278.80[4] acres of open space will be dedicated as a conservation easement to the County of San Diego with the California Department of Fish and Game (CDFG) as a third party to the easement (Figure 1-4) and the vast majority of the 578-acre camp will be left undeveloped (Figure 1-13). The conservation easement area will be managed by an established conservancy group pursuant to a Habitat Management Plan to be submitted and approved by the County of San Diego. Land uses within such dedicated open space are generally very limited, to those which are considered compatible with the need to permanently protect the natural resources. The following activities are typically precluded on land which is dedicated as an open

[4] Note: The proposed open space configuration has been significantly expanded since the 2005 Draft EIR. See Figure I-2.

space easement to the County: grading, excavation, placement of soil, sand, rock, gravel or other material, clearing of vegetation, construction, erection or placement of any building or structure, vehicular activities, trash dumping or use for any purpose other than as open space, or planting of vegetation materials. Similarly, the undeveloped areas would not be subject to grading, clearing, construction, or other disturbances associated with project construction and/or Camp operations.

Circulation. Access to the site is from SR-67 and Mussey Grade Road. A gated, private, dirt road currently provides access to the site from Mussey Grade Road. The existing on-site circulation system consists of one main dirt road with smaller branches off of the main road. Interior circulation consists of a network of meandering private roads that reflect the rural character of the Ramona backcountry and complement the rustic camping experience.

Primary ingress/egress to the site will continue to be provided via the existing entry and main dirt access road off of Mussey Grade Road. Portions of the access road would be improved to a 24-foot-wide paved asphalt access road designed in accordance with County Department of Public Works and Ramona Fire Department standards. Several secondary access road branches would split off the main access road, providing access to other developed areas of the site. The roadway locations and sizes are designed to facilitate the efficient movement of vehicular traffic throughout the site, including emergency vehicles, and to avoid to the maximum extent possible, sensitive biological habitats such as wetlands.

A second road[5] would provide access to the proposed retreat in the northeast portion of the site. The road extension to the retreat has been carefully aligned to minimize impacts to existing oaks and topography in the immediate area. This access road would consist of a new 24-foot-wide paved asphalt road that would branch off the main access road to provide access to the camp and retreat.

Design. The proposed development concept emphasizes an early California ranch style, which builds on the existing camp theme and exemplifies Ramona's rustic, rural community character. New structures will be one- and two-stories and range between ten to a maximum of 30 feet in height. By limiting building heights and using building materials and styles consistent with surrounding development, the proposed project will be compatible in scale and character with the surrounding residences, the adjacent commercial horse breeding ranch and stables, and the Ramona Community Design Guidelines (1993) which directs that new development "*respect the scale of the community with respect to apparent size and scale of new buildings*." The project components will complement and integrate with the existing landform and minimize encroachment into hillsides and sensitive biological habitat. The project proposes to protect important environmental resources while providing adequate facilities to meet the Salvation Army's long-term camping, educational, recreational, and retreat needs.

Drainage. Several ephemeral and intermittent drainages pass through or are contiguous to the project site. Construction within drainage courses has been limited to the maximum extent possible. In order to gain access to the northern portion of the site and the proposed Retreat Center, it is necessary to

[5] Note: This proposed road would be eliminated under Reduced Project Alternative I.

construct a roadway across a drainage course. Fill dirt would cover 50 lineal feet of the drainage and runoff would be carried beneath the roadway in two 36-inch diameter concrete pipes. A ten-inch diameter water main would also cross this drainage near the easterly project boundary. The main would be placed underground at a depth of three to five feet.

The existing main access road crosses three drainage courses near the project boundary east of the existing development on the site. The existing decomposed granite roadway surface in this area will remain. However, to improve drainage, three culverts will be installed, including two 18-inch diameter pipes and one 36-inch diameter pipe. Additionally, a ten-inch diameter water main will be constructed beneath the road at a depth of three to five feet.

Runoff will be captured in vegetated swales at the tops of all manufactured slopes and below all new facilities. Most of the swales will empty into detention basins where debris and polluted sediment will be allowed to settle, a flow from the retention basins will be released at a controlled rate. Storm water that is not directed into retention facilities will be spread onto the existing ground by the use of level berms. All runoff will be filtered through bio swales or other mechanisms approved by the County, then released back into the natural drainage courses in such a controlled manner as to minimize erosion.

Grading. The proposed project includes grading to provide level pads for building construction, parking areas, and for internal roads, as detailed in the Conceptual Grading Plan. Grading for all building pads would be generally limited to existing flat areas of the site, and would be clustered to preserve the natural landform and minimize encroachment into hillsides and sensitive riparian areas.

Approximately 56 percent (322 acres) of the total 578-acre property has slopes greater than 25 percent. The majority of slopes greater than 25 percent are located at the higher elevations in the western and southern portions of the property. The project, at buildout, will result in 3.9 acres or 1.21 percent total encroachment into steep slopes.

Lighting. The proposed conceptual lighting plan includes six types of lighting fixtures. Type A is a building fixture, triangular in shape with fluorescent downward light to illuminate the immediate adjacent area only (37 watts). Type A lights are proposed for the common and high use areas of the campground, such as the activities building, dining areas, educational buildings, indoor mini-theater, multi-purposed building, maintenance facility and retreat. Type B lights are cabin fixtures, triangular in shape with fluorescent downward light to illuminate the door only (18 watts). Type B lights are proposed in the cabin camp and bathroom/shower areas and the maintenance facility. Type C are fluorescent fixture walkway bollards, less than four feet in height, and would be used in the main pathways throughout the developed portions of the camp (18 watts). Type D are trellis lights with fluorescent fixtures, mounted on a trellis structure (25 watts). This type of light is proposed within the outdoor areas of the dining facility. Type E is [a tennis court fixture on a 35-foot pole with timer (auto shut-off) to illuminate the retreat tennis courts and the maintenance facility (465 watts)]. Type F is [a flood light fixture, 25 foot pole with timer (auto shut-off) to be used for the play multi-purpose courts on-site (465 watts)].

All lighting would comply with the County of San Diego outdoor lighting control ordinances. Low-pressure sodium lamps would be used in conjunction with cut-off shields (fully shielded/full cut off lighting) to reduce the adverse effects of artificial lighting

1.1.1.1 Proposed Project Operational Characteristics

With implementation of the proposed project, the camp will function in a manner similar to its existing operational characteristics (Section 1.4). The primary use of the camp will continue to be for provision of a one-week camping experience for underprivileged youth. This will occur primarily during the summer but will also occur during the remainder of the year. The retreat component will be available for Salvation Army groups or rental to other compatible groups throughout the year. The Salvation Army will continue its rental rules, requiring that all renters carry insurance and prohibiting any alcohol or tobacco at the camp. It is anticipated that the past renters listed in Section 1.4 will continue to rent with development of the new facility and that other similar users will also use the facility. The remaining (non-retreat) camp facilities will also be available for rental when not in use by the Salvation Army. However, this is generally limited to rental by youth groups due to the rustic, communal-style facilities. Regardless of camp composition as Salvation Army users, other organizations, or a mix thereof, maximum capacity of the camp will be 748 persons. This maximum capacity has been calculated based on building capacity and tent accommodations and includes users, staff, and support personnel.

1.1.1.2 Major Use Permit Approval Conditions

Should the County of San Diego approve the proposed project, the following conditions and restrictions would be included in the Major Use Permit.

- All buildings (with the exception of the yurts) shall be rustic in style, to complement the existing structures on the site and to blend into the natural environment surrounding the camp (Figure 1-17). Buildings shall not exceed the square footages specified in the project description, and building footprints shall follow the general configuration as shown on the overall site plan and enlarged site plan areas. The maximum height of any structure shall not exceed 30 feet above finished grade.
- In general, buildings shall have simple, direct massing. Overly abstracted angles and shapes will be discouraged. Visible roof forms shall be Hip, Gable or Shed in nature, and shall reflect the sloping nature of on-site topography. Building walls in excess of 100 feet in length shall be offset by a minimum of four feet, to break up any potentially long mass.
- Single-story buildings shall sit on level areas to minimize the topographical impact of their surrounding site. Though the majority of buildings on the site shall be single story structures, the housing structures at the retreat component, the Multi-Purpose Building at the camp's hub, and the Staff Housing west of the Ranch House shall be two stories.
- The housing structures at the retreat component shall be stepped, and planted into the slopes at their lower floor, to follow the contours of the adjacent topography. The lower floor of the Multi-Purpose Building shall also be planted into the slope to minimize the visual impact of the overall building. Because the staff housing units are proposed on relatively flat sites, they shall be allowed to be true two-story structures.

- Materials for all buildings shall be compatible with the natural surroundings of the site. Exterior wall materials may include slump stone masonry, earth-toned concrete masonry units, stone veneer, plaster, brick, or wood. Metals, or other highly reflective materials shall not be permitted as an exterior wall material, or other ancillary structures.
- Glazing shall be of a low reflectance nature. Highly reflective glass shall not be permitted. Glass may be shaded in bronze, green or gray tints only. Other tined colors shall not be permitted. Exterior paint and stain colors shall be limited to earth tones. Bright accent colors shall not be permitted.
- All lighting shall comply with the County of San Diego outdoor lighting control ordinances. Low pressure sodium street lights may be installed if deemed necessary for safety. This shall only include intersections, sharp turns, and where there is a sudden change in horizontal or vertical alignment. The exact locations for any streetlights shall be determined when the design for roadways is finalized.
- All utility lines shall be below ground.

The following specific design features are broken into groupings by resource area and shall be conditions of approval of the Major Use Permit associated with the proposed project.

A. Biological Resources

- The applicant shall provide evidence that all required state and Federal wetland permits have been obtained or that none are necessary;
- The open space area on-site shall be dedicated as a conservation easement to the County of San Diego with the California Department of Fish and Game as a third party;
- Habitat Management Plan (HMP) shall be prepared for the conservation easement and submitted to the County of San Diego prior to grading, clearing or use/reliance on the Major Use Permit. An established conservancy group subject to County approval, shall be selected to manage the habitat in accordance with the approved HMP. The HMP shall include the name of the conservancy group;
- After any trenching in the root zone of oak trees, the tree shall be carefully pruned to remove canopy material proportional to the roots lost or damaged;
- If it is necessary to apply an herbicide for weed control before laying asphalt or other impermeable surfaces, one such as dichlobenil (Casoron®) or glyphosate (Roundup®) shall be utilized by a licensed pesticide applicator in order to prevent damage to existing tree roots or roots that later may grow beneath the pavement;
- Any staging/storage areas for equipment and materials shall be located within identified development areas;

- All excavated soils from trenching operations shall be stored above the ordinary high water mark for all drainages ~~during the rainy season and any materials placed in a seasonally dry portion of a drainage shall be removed prior to inundation by high flows~~;
- Silty turbid water shall not be discharged into any drainage; such water shall be settled, filtered, or otherwise clarified prior to discharge, (this condition may augment, but shall not override anything within the project's Regional Water Quality Control Board Certification);
- Spoil, trash, or any debris from construction of the project or operation of the facilities shall be promptly removed and transferred to an approved disposal facility off-site;
- Speed bumps or similar speed reduction devices shall be installed from the site entrance to the Retreat Center access road.
- The 15 mph speed limit currently established on the Camp shall be maintained;
- No re-grading of the dirt road "cross" trail shall occur in areas of sensitive plants and new trails shall be prohibited;
- Foot stakes shall be installed on the dirt "cross" trail border every 100 feet, as indicated in Figure 1-14;
- Signage shall be posted at regular 200-foot intervals along both sides of the dirt "cross" trail instructing hikers to remain on the marked trail and refrain from collecting flowers/plants, as indicated in Figure 1-14;
- The existing trail in the northwestern portion of the project site shall be bound by signs that prohibit human intrusion into surrounding habitats and indicate the presence of environmentally sensitive areas;
- Low-pressure sodium lamps shall be used in conjunction with cut-off shields (fully shielded/full cut off lighting) to reduce the adverse effects of artificial lighting spilling into native habitats;
- New lighting shall not be allowed within 100 feet of the property boundary, wildlife corridor, or preserved areas;
- Fencing (non-barbed) shall be constructed at the perimeter of open space easements where they border development (a Camp facility or roadway) to prevent intrusion into the preserve areas;
- Wildlife crossing signage shall be posted in the vicinity of the local movement corridor;
- Fencing shall be installed to facilitate use of the Mussey Grade Road culvert at the West Fork of San Vicente Creek by wildlife;
- Signage shall be installed in the area of the Camp entrance to notify visitors of the presence of sensitive flora and fauna within the vicinity and the need for adherence to postings throughout the project site;

- Install Slow – Wildlife Crossing signs and speed bumps at the turnout for the Retreat Center for entering visitors, 100 feet upslope for existing visitors, and on both sides of the road every 250 feet along the camp access road from the junction of the access road with Mussey Grade Road;
- Signage shall be posted along the perimeter of the open space easements which adjoin the project site and more frequently in the vicinity of any sensitive habitat;
- Temporary construction fencing shall be erected to delineate Emergent Wetlands along the roadway. Temporary construction fencing and monitoring shall be maintained throughout the construction period to prevent inadvertent impacts. Permanent split-rail fencing shall be installed and maintained following construction. Both temporary construction and permanent split-rail fencing shall include signs that mark the areas as an "Environmentally Sensitive Area – No ~~Clearing or Trampling of any Sort~~Entry." (Figure 1-15)
- Landscaping within the project area shall not include invasive exotic species, as defined by the California Native Plant Society;
- Leash law restrictions shall be posted and enforced on-site ~~and resident staff shall be prohibited, through written camp policy, from keeping cats, unless they are strictly confined to indoors~~;
- Resident staff shall be prohibited from keeping cats, unless they are strictly confined to indoors. The applicant shall enforce this regulation with a signed agreement (covenant) with any personnel living temporarily or permanently on-site which details all of the sites rules and regulations and allows for eviction or fee imposition if the regulations are violated;
- Promote oak seedling recruitment through planting programs by Camp users and growth in the road fire-clearance zones;
- Conduct weekly fugitive dust monitoring activities from April through November and prior to any large special events;
- Perform road-wetting immediately prior to and during any special events and, if dust levels are such that roadside plants are coated with dirt, immediately after weekly fugitive dust monitoring;
- Remove any trash or roadkill from the internal roadway to avoid luring other animals into the roadway; and,
- All buildings shall be constructed to eliminate cavities and crevasses or other measures to reduce the likelihood of bat colonization. Any unused structure shall be dismantled before bats have an opportunity to colonize it. Any structure slated for removal shall be examined for sensitive bat species before demolition; and if significant impacts would occur, mitigation shall be developed and implemented to the satisfaction of the DPLU DIrector.

B. Hazards and Hazardous Materials

In order to diminish potential fire emergency impacts, a 260,000-gallon water tank, 60 feet wide and 13 feet high, shall be located next to the existing 10,000-gallon tank in the central area of the project site to provide necessary water flow in the event of a fire emergency. Additionally, all existing and proposed

buildings should be retrofitted with fire sprinklers, and removal of Oak trees has been avoided to the maximum extent possible both due to their biological significance and because they do not tend to spread fires. Specific FPP provisions and conditions are discussed in detail in RDEIR Section 2.3 Hazards and Hazardous Materials.

C. Noise

- Trash collection and deliveries shall not occur within 100 feet of the property boundary.
- Band practice shall not occur outdoors.
- All permanent pool pumps shall be within an enclosure. Enclosures shall be light tight and constructed of any material with a minimum surface weight of 3.5 pounds per square foot. Doors, hatches and other openings shall have full perimeter weather-stripping. The enclosure shall be constructed so that the sides and top are no closer than two feet to any portion of the pump. The enclosure shall have a minimum Sound Transmission Class rating of 40 and a ventilation fan rating not to exceed 15 Sones. The surface area for each intake and exhaust openings shall not exceed ten percent of their respective total surface area.

D. Hydrology/Water Quality

Project features that shall minimize water quality impacts include decomposed granite parking areas, which allows runoff to permeate through the soil below. Additionally, landscaping and open space areas such as play fields and leach fields shall filter runoff and absorb rainfall during storm events. Further measures that shall be incorporated into the project design shall include, but not be limited to, the addition of infiltration basins, and vegetative controls such as grassed swales and vegetative filter strips. Since the project does not propose agricultural use or to keep livestock on-site, potential pollutants from pesticides and animal waste shall not occur.

Best management practices (BMP's) have been incorporated into the project in order to minimize project impacts. A complete listing of all project BMPs are included in EIR Section 6.1.3, Hydrology/Water Quality (and duplicated in Section 9.3.4). The BMPs are considered part of the project design and shall be included as conditions of approval of the Major Use Permit associated with the project.

E. Transportation/Traffic

- Youth campers, who comprise the majority of camp users, shall continue to be transported to and from the camp via bus or vanpool.
- The Retreat Center rental contract shall recommend bus, van or carpool be the mode of transportation.

Although not a MUP condition, the Salvation Army has offered to make a $5,000 voluntary public contribution to the County of San Diego for planned improvements to the intersection of SR-67/Dye Road/Highland Valley Road.

1.2 Project Objectives

Though the Salvation Army is involved in a number of charitable activities, the purpose of the project described herein relates primarily to the Salvation Army's children's and educational service programs. The Army has been committed for over three-quarters of a century to providing camping experiences to children who normally would not be exposed to such opportunities. Providing camping experiences and a supportive environment for youth is a very important component of the Army's Preventative Program for "At Risk" Youth. The camping experience is viewed by the Army as a way to remove at-risk youth from their day-to-day environment and expose them to a beautiful and natural experience, both physically and intellectually, where they can explore alternative, positive possibilities and attitudes for themselves and their futures. Typically, the youth that are served by the camp are from single-parent families that are not able to afford the cost of summer camp. Though the Army suggests that the family provide a nominal donation, typically five to ten dollars, to fund their child's camp attendance, such donations are not required for attendance and are based on ability to pay.

Like many other professionals in the field of juvenile behavior, the Salvation Army understands that the provision of a positive and supportive environment for at-risk youth is a method of preventing future problems for those youth and for society. According to a U.S. Department of Justice report (1996), "The most effective [preventative] programs are those that address key areas of risk in the youth's life, those that seek to strengthen the personal and institutional factors that contribute to healthy adolescent development, those that provide adequate support and supervision, and those that offer youth a long-term stake in the community." This type of environment is what the Army seeks to provide at the Salvation Army Divisional Camp Retreat in Ramona. The camp experience is the pinnacle of the Army's preventative program.

Prior to the acquisition of the camp in 1997, there were no accommodations for the Salvation Army camping programs in San Diego County. In 1995, the Army began a search for a camp area where it might begin such services for the area's youth. In 1997, The First Presbyterian Church of San Diego offered to sell its 578-acre camp near Ramona, to the Army. This was an especially appealing offer for two reasons: 1) the camp had existing facilities that allow camping programs to begin immediately; and 2) the camp had a vast amount of space to expand the camp program facilities while still retaining the rural nature of the site and preserving the vast majority of the site in its natural state.

The Salvation Army purchased this property in 1997 and continued the camp programs. However, the camp and retreat facilities are limited and are insufficient for existing activities. The limited size, program, and facilities preclude provision of the level of service that the Salvation Army seeks to provide with its County of San Diego local camp program. Many children are turned away each year due to limitations of the existing program and facilities. While the camp buildings and facilities have been well-maintained, there are several significant short-comings, including a dining hall that is too small to serve even the existing camp capacity, insufficient indoor space to house camp-wide activities, and camp bunkhouses that sleep only one-fourth of the campers and visitors the Army wishes to serve. Further, staff housing is insufficient and recreational and educational facilities are inadequate at the camp.

Additionally, due to current limitations of the facilities during the summer months, the Army cannot rent the site or allow other Salvation Army groups to use the camp as the camp is used at full capacity for youth camps. This is problematic for two reasons. First, the Salvation Army loses revenue for providing scholarships to underwrite the expense of providing the youth camp. Rental income during the summer months assists the Salvation Army in their ability to provide camping opportunities to underprivileged children. Secondly, many organizations, including the Salvation Army itself, like to use the facility during the summer. However, this is not currently possible since the existing camp is fully utilized by children's camps.

Given the limitations of the existing camp, the specific objectives of the proposed Salvation Army Divisional Camp and Retreat include the following:

1. Implement a 20-year master plan of improvements for the existing Salvation Army Divisional Camp and Retreat to serve the needs of the community and youth of the San Diego region with a capacity of approximately 748[6] users;
2. Maintain the predominately rural and rustic character of the site;
3. Provide a comprehensive plan for logical development that is sensitive to the existing environment, and provides for habitat protection consistent with the existing surroundings;
4. Provide a retreat center in a camp-like setting with an atmosphere conducive to personal growth that is physically distinct and isolated from the remainder of the camp facilities[7];
5. Create a design that is harmonious with the natural landscape by clustering development and maintaining and using basic natural landforms to the extent feasible and considering topographic, geologic, hydrologic, and environmental opportunities and constraints;
6. Provide necessary infrastructure to support the expanded camp development in an efficient and timely manner;
7. Improve fire-fighting capabilities within the site; and,
8. Reinforce the community identity of Ramona and the County of San Diego through implementation of the Major Use Permit modification, which controls project design elements such as architecture, landscaping, color, paving, walls, fencing, signage, pedestrian and hiking trails, and internal circulation through a viable circulation network.

1.3 Intended Uses of this EIR

This project-level EIR is intended to provide information to public agencies, the general public, and decision makers regarding the anticipated environmental impacts of the specific development of the proposed Salvation Army Divisional Camp and Retreat. Under the provision of CEQA, "the purpose of an environmental impact report is to identify the significant effects of a project on the environment, to

[6] Note: 615 users under Reduced Project Alternative I.

[7] Note: This objective would not be achieved under Reduced Project Alternative I.

identify alternatives to the project, and to indicate the manner in which significant effect can be mitigated or avoided" (Public Resources Code 21002.1[a]).

1.3.1 Matrix of Project Approvals/Permits

The agencies that are expected to use this EIR and the approvals and permits needed to implement the project are as follows:

Agency	Approval
County of San Diego – Lead Agency	• Major Use Permit Modification (P70-379W); and • Grading Permit
U.S. Army Corps of Engineers – Responsible Agency	• Clean Water Act – Section 404 Permit for fill in waters of the United States
California Department of Fish and Game – Responsible Agency	• Streambed Alteration Agreement – Section 1603 for fill in streambed
California Regional Water Quality Control Board – Responsible Agency	• Clean Water Act – Section 401 Approval or Waiver for fill in waters of the United States
Local Agency Formation Commission (LAFCO)-Responsible Agency	• Annexation of a 10.8 acre parcel into the Ramona Municipal Water District

1.4 Environmental Setting

The setting of the Salvation Army Divisional Camp and Retreat is varied. While the area is generally rural, there is considerable development in some surrounding areas. The surrounding setting and uses, existing setting and uses of the camp, and project consistency with applicable regional and general plans are discussed herein.

1.4.1 Existing Topography, Natural Habitats and Land Uses

The majority of the site is characterized by steep, rugged terrain, with boulders and rock outcroppings interspersed with trees, shrubs and dense vegetation (Figure 1-16). The existing and proposed camp facilities are proposed within the disturbed, more level terrain and buildable areas of the site. Currently, there are camp buildings and associated roads and improvement, several hiking trails, and a mounted cross in this mountainous terrain (Figure 1-16). The site is comprised primarily of southern mixed chaparral habitat. However, coast live oak and Engelmann oak riparian forests and woodlands; mule fat scrub; Diegan coastal sage scrub; non-native grassland; non-native woodland and mafic southern mixed chaparral habitats are also supported. These habitats support a wide variety of flora and fauna, including many sensitive species. The City of Poway's 865-acre Iron Mountain Open Space/Resource Management Area, a significant biological conservation area, is located to the west of the site. The camp is located within the County's Multiple Species Conservation Program (MSCP) Subarea Plan area.

Coast live oak and Engelmann oak woodland and riparian habitats are associated with the meadows and various streams, respectively, on the property. Chaparral and coastal sage-chaparral habitats are generally associated with the upland portions of the property. The areas with reduced biological sensitivity generally occur in the immediate vicinity of the existing development and the least disturbed

areas of the site generally occur within the drainages and chaparral covered slopes along the northern and western portions of the site.

The existing camping facility is located in the east-central portion of the property in the gentler, lower-lying areas. The buildings are generally rustic and low profile, with earth tone colors and exterior treatments that blend into the natural surroundings. Existing land uses include the following:

- Central dining facility ("Ranch House")
- Small infirmary
- Small office building
- Swimming pool and restroom and showers
- Maintenance building and yard
- Five masonry cabins
- Retreat center with a meeting hall ("Lodge") and five cabins for guest housing
- Two staff housing buildings
- Small canteen
- Trailer
- Outdoor meeting area and forum
- 10,000-gallon water tank
- Recreational playing fields
- Six semi-permanent dome-shaped tent structures ("yurts") for camping

The camp has an existing backbone infrastructure system that consists of a system of traditional wooden "T" power poles with 12 KiloVolt lines, a 10,000-gallon water tank and pump, a septic sewer system, and a network of private dirt, asphalt, and gravel roads.

1.4.2 Existing Operational Characteristics

The primary use for camp is to provide a one-week camping experience to underprivileged children. This takes place primarily during the summer months; however, it can also take place over weekends during the remainder of the year. Two kinds of groups use the facility during the off-season, Salvation Army and non-Salvation Army groups. Salvation Army groups include family camps, women's camps, men's camps, seniors' camps, young adult retreats, youth leadership programs, elementary retreats, staff retreats, and community center groups. Non-Salvation Army groups include, but are not limited to, churches, colleges and universities, service organizations, etc. Following is the Sierra del mar Divisional Camp user list, including organizations that have rented the camp in 2001:

- Apostolic Assembly
- Calvary International Fellowship
- Church of the Good Sheperd
- Cypress E.V. Free Church
- Cursillo
- Faith Presbyterian Church
- First Presbyterian Church, El Cajon
- Fallbrook First Baptist Church
- Holy Trinity School
- Horizon Christian Fellowship
- Iglesia Presbiteriana Hispana
- La Jolla Monthly Meeting
- Laguna Presbyterian Church
- Lamb's Players
- Maranatha Chapel
- Mount of Olives Church
- New Life Presbyterian Church
- Our Lady of Mount Carmel
- Palomar Christian Fellowship
- Point Loma University
- Saint Martin's Church
- St Mary's Catholic Church
- St. Michael's Catholic Church
- St. Pius Catholic Church
- Storymakers
- The Neighborhood Church
- University of San Diego
- Valley Center Church
- Women in Recovery

Alcohol and tobacco are strictly prohibited at the camp. Because the Salvation Army rents only to users with a certificate of liability insurance, this generally limits usage to organized groups.

The existing Salvation Army Divisional Camp and Retreat operates year-round, with operations generally divided into two seasons: 1) Camp (summer), which includes youth camping for eight weeks during mid-June to mid-August; and 2) Retreat, which includes Salvation Army group retreats and private rentals for the balance of the year. The current typical summer population is approximately 165 people (115 youth campers and 50 staff). The campers stay for one week, and generally arrive on Monday afternoons (between 2:00 and 4:00 p.m.) in passenger vans and buses and depart on Saturday morning (between 9:00 and 10:00 a.m.). Camp staff generally arrives on Monday mornings and departs on Saturday afternoons, with one-half remaining for the duration of the season. The typical Retreat population is approximately 90 people, including five staff members. The Retreat groups generally arrive on Friday evenings (after 6:00 p.m.). Most Retreat visitors arrive by van or carpool (Appendix E). These groups leave on Sundays around midday.

1.4.3 Existing Surrounding Land Uses

Open space, low-density rural single-family housing, and a commercial horse-breeding ranch surround the project site. Traveling south from SR-67 on Mussey Grade Road toward the project site, residences line the roadway at a relatively high density (i.e. more than one residence per four acres), then give way to a less dense, oak-lined roadway preceding the camp entrance. Approximately 1,500 feet north of the project boundary are large lot residences and the commercial Golden Eagle West Horse Breeding Ranch. Residences northeast of the project site are approximately 1,000 feet away, and homes immediately east are approximately 20 to 200 feet from the project boundary (Figure 1-16). Based on aerial photographic interpretation of the approximately one-mile area surrounding the site, housing densities are roughly one house per two acres to the north of the site; approximately one house per acre to the northeast, and approximately one house per five acres to the east. Areas to the south and southeast are relatively undeveloped, with very low housing densities.

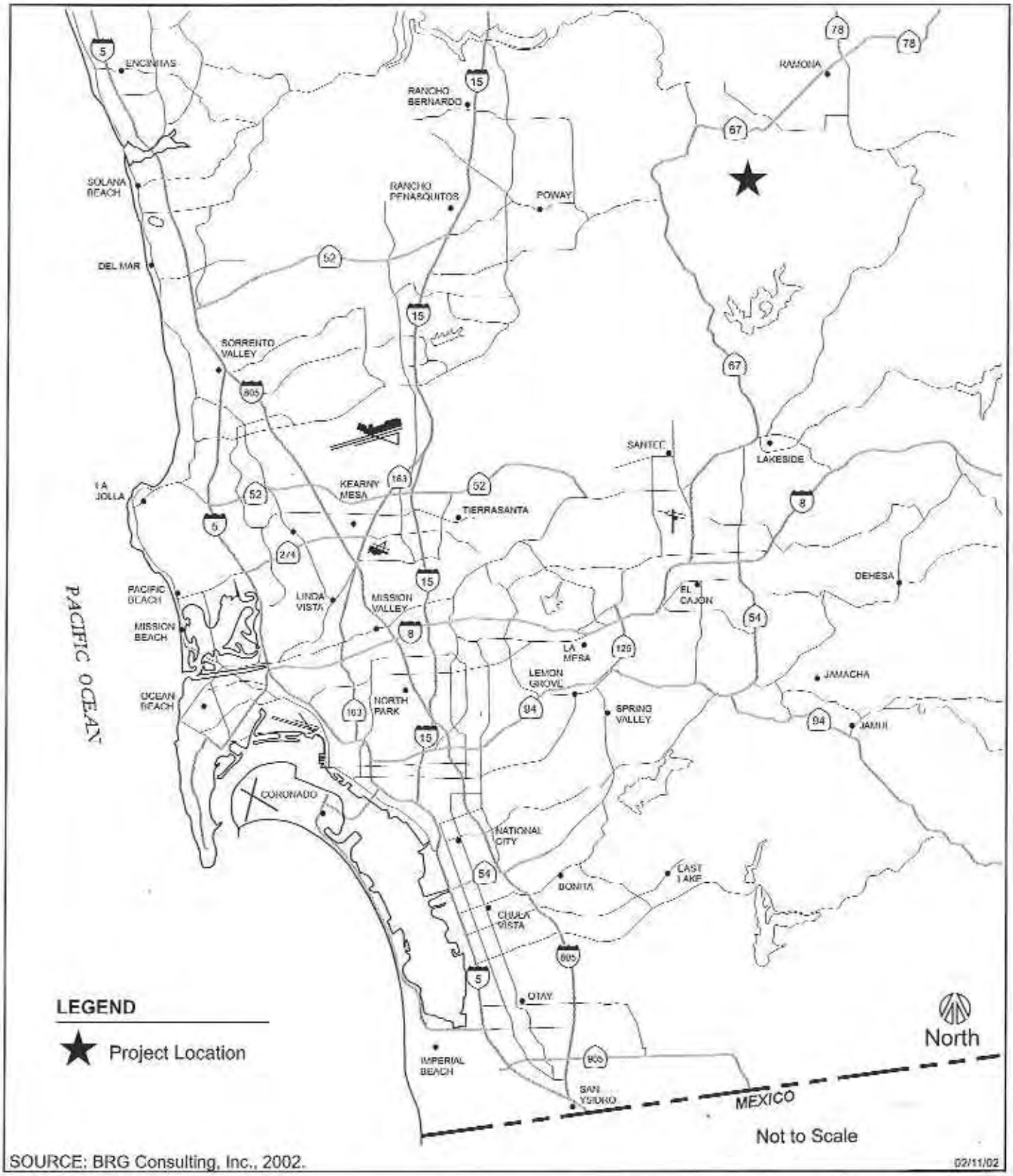
To the west of the site is the Iron Mountain Cornerstone Resource Conservation area and the eastern municipal boundary of the City of Poway. Approximately three miles northeast of the site are the Santa Maria Valley and the town of Ramona, which are located in a low-lying area surrounded by mountainous and rugged terrain.

Very few east-west improved roads exist. Many of the existing homes in the area have private roads with restricted access.

1.4.4 Consistency of Project with Applicable Regional and General Plans

Please refer to the identified EIR section for a detailed discussion of the project's compliance with the following plans:

- County of San Diego General Plan, including the Ramona Community Plan and Ramona Design Guidelines (EIR Section 2.7);
- County of San Diego Multiple Species Conservation Program and Biological Mitigation Ordinance (EIR Section 2.2);
- Regional Air Quality Standards Plan (EIR Section 3.1.8).



SOURCE: BRG Consulting, Inc., 2002.

02/11/02

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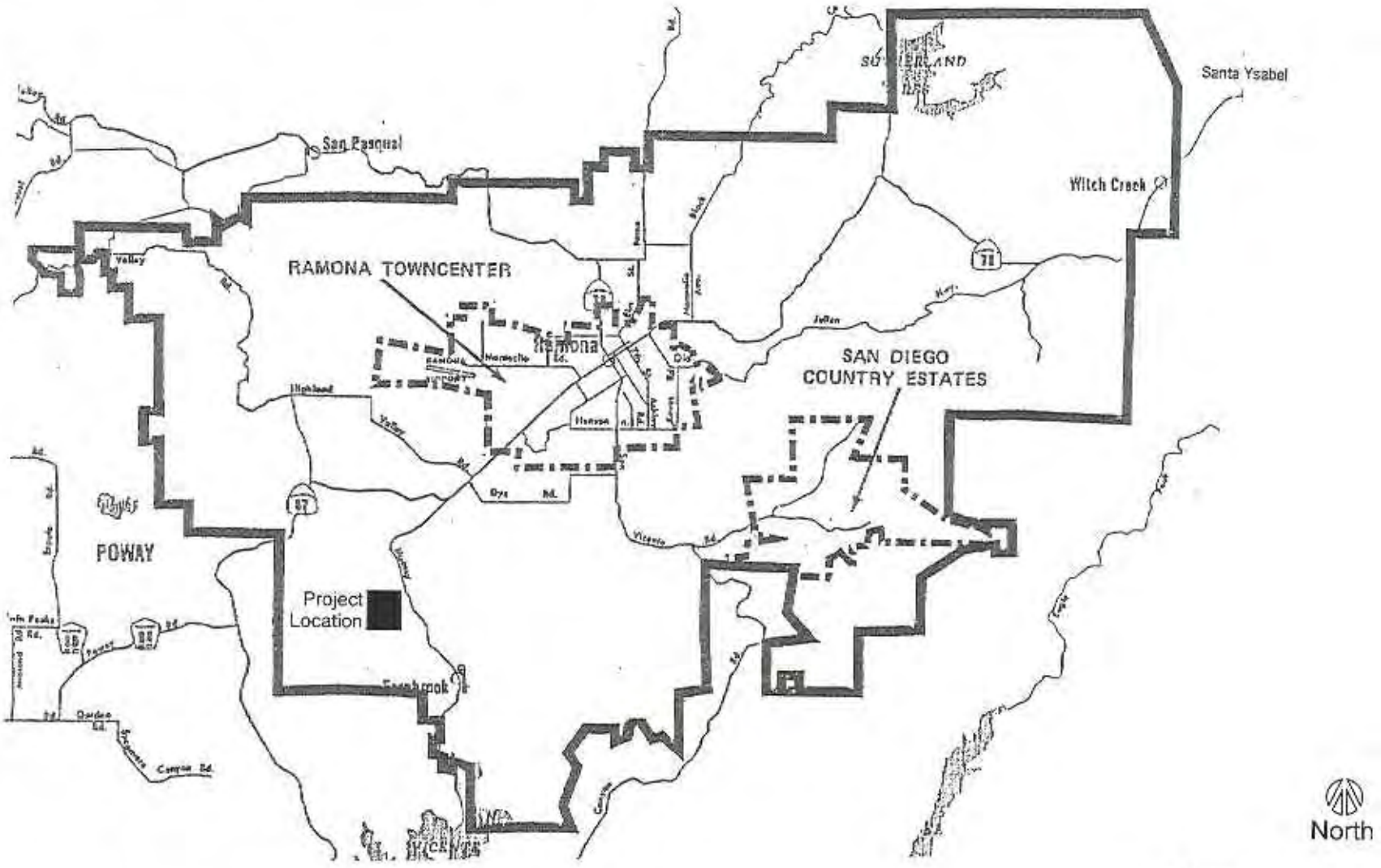
Salvation Army Divisional Camp and Retreat

Regional Location Map

FIGURE 1-1



SOURCE: BRG Consulting, Inc., 2002; BASEMAP: Ramona Community Plan, Amended 1995

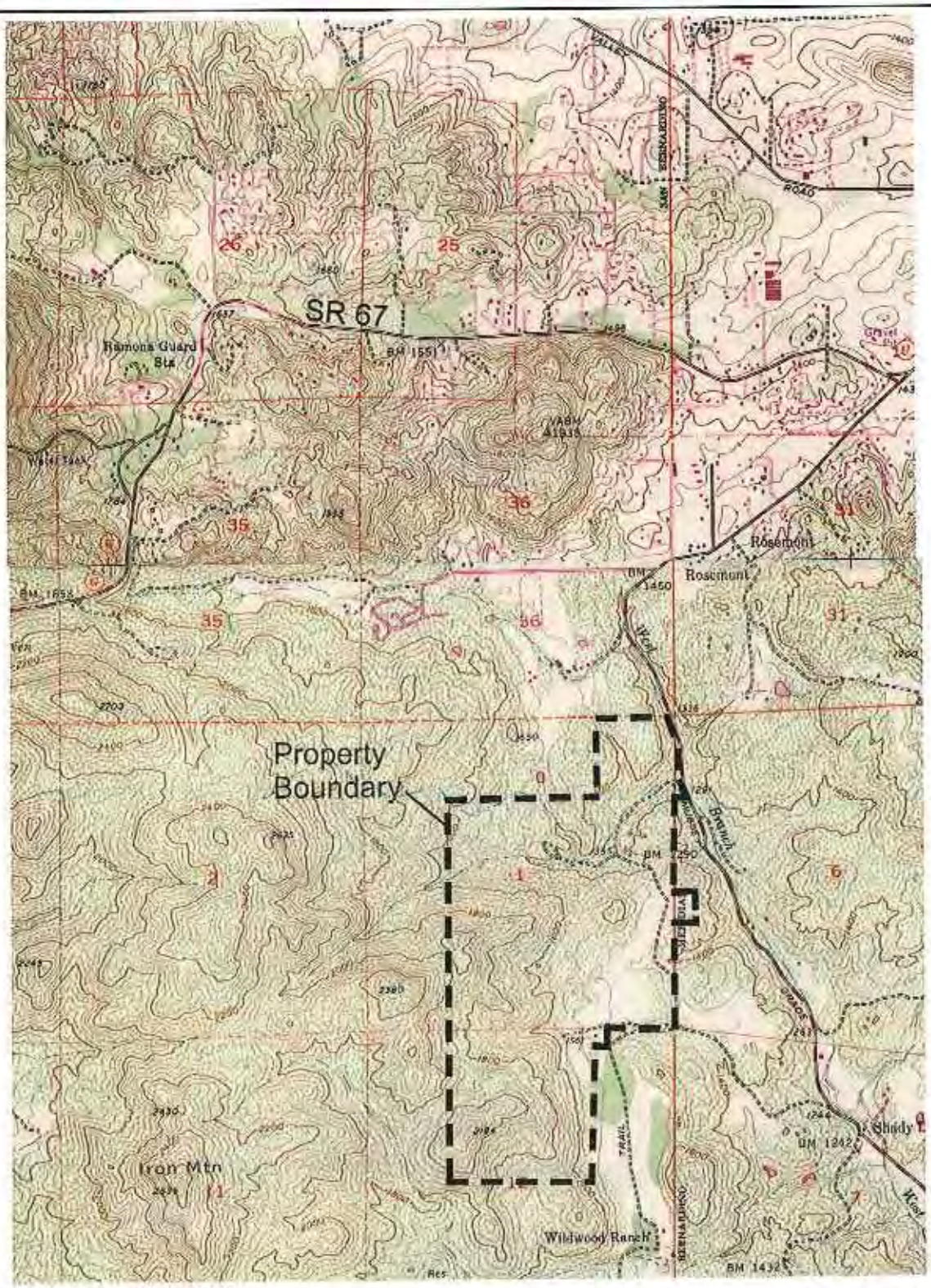
02/10/02

BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Project Location in Ramona Community Planning Area

FIGURE 1-2



SOURCE: BRG Consulting, Inc., 2002;
BASEMAP: USGS 7.5 Minute Quadrangle, San Vicente Reservoir/San Pasqual.

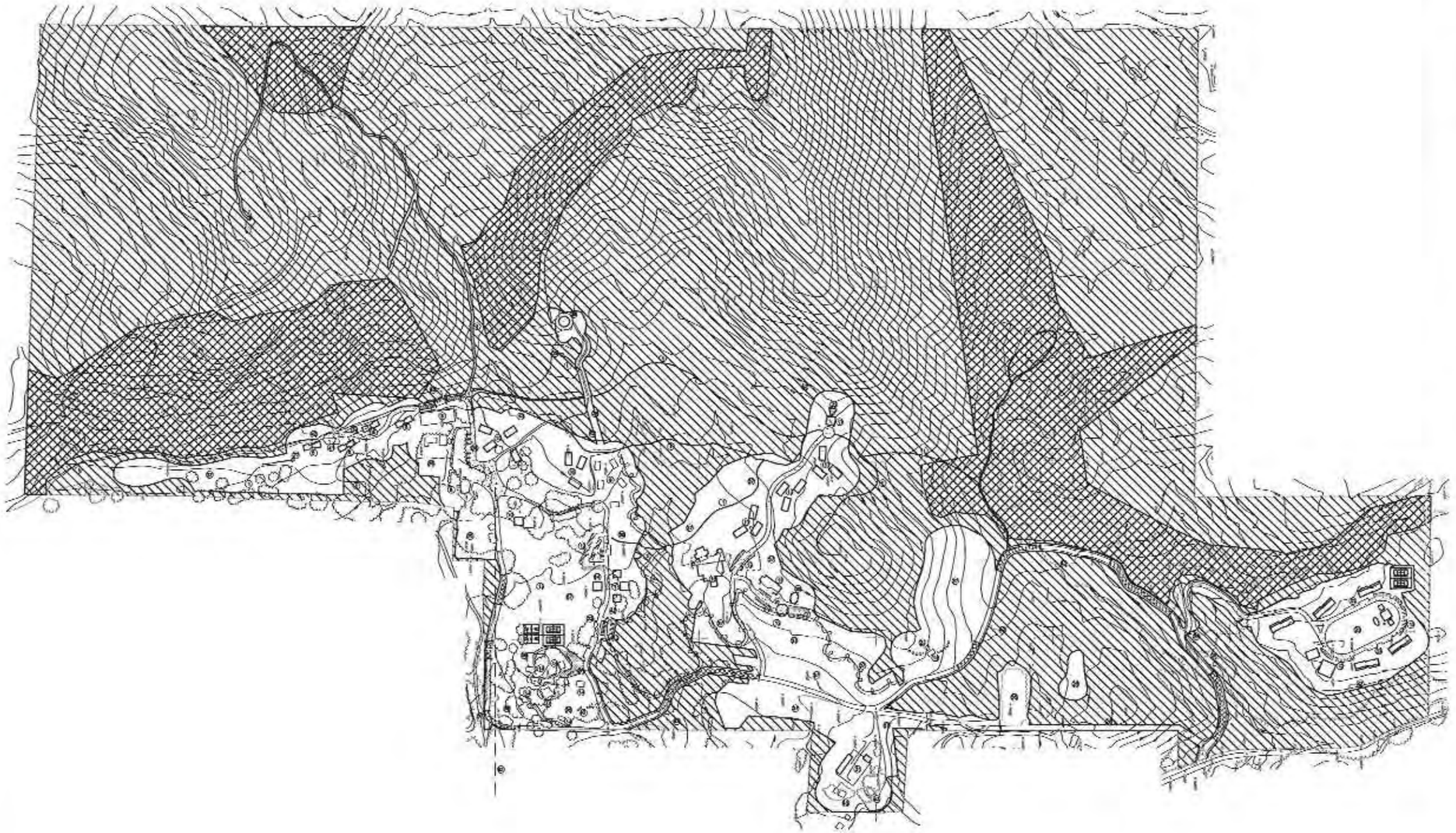
Not to Scale

BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Project Vicinity Map

FIGURE 1-3



LEGEND

1. EXISTING DIRT HIKING TRAILS TO REMAIN
2. EXISTING PRESENTATION AREA TO REMAIN
3. EXISTING SPORTS COURTS TO REMAIN
4. NOT USED
5. NOT USED
6. PROPOSED STAFF HOUSING - SEE ENLARGED PLAN
7. EXISTING POOL/RESTROOM/SHOWER FACILITIES
8. EXISTING RANCH HOUSE
9. EXISTING CABINS
10. PROPOSED CABIN- CAMP EXPANSION - SEE ENLARGED PLAN
11. PROPOSED ADMINISTRATION AND MEDICAL/NURSE STATION AND SHOP/CANTEEN SEE ENLARGED PLAN
12. PROPOSED PARKING AREA - SEE ENLARGED PLAN
13. EXISTING PLAY FIELDS
14. EXISTING CABIN CONVERTED TO STAFF HOUSING
15. EXISTING RETREAT BUILDING CONVERTED TO CHAPEL
16. PROPOSED DINING ROOM
17. PROPOSED EDUCATION CAMP - SEE ENLARGED PLAN
18. PROPOSED TENT CAMPING - SEE ENLARGED PLAN
19. PROPOSED MULTI-PURPOSE FACILITY - SEE ENLARGED PLAN
20. PROPOSED INDOOR MINI-THEATER - SEE ENLARGED PLAN
21. NOT USED
22. PROPOSED PRESENTATION AREA
23. PROPOSED RETREAT - SEE ENLARGED PLAN
24. PROPOSED GATE HOUSE
25. EXISTING LANDFILL TO BE REMOVED
26. PROPOSED ONSITE 10" PRIVATE WATER LINE (TO REPLACE EXISTING ONSITE 6" WATER LINE)
27. PROPOSED ROPE COURSE
28. PROPOSED 260,000 GALLON WATER TANK
29. EXISTING 10,000 GALLON WATER TANK
30. EXISTING 6" PRIVATE WATER LINE TO REMAIN
31. RELOCATED MAINTENANCE AREA
32. EXISTING MAINTENANCE FACILITY TO BE RELOCATED
33. VAN/BUS PARKING/PICK-UP/DROP-OFF
34. PROPOSED POOL AND BATHROOM/SHOWER
35. PROPOSED OVERFLOW PARKING (DECOMPOSED GRANITE)
36. EXISTING LEACH FIELD
37. PROPOSED LEACH FIELD
38. STAFF PARKING
39. EXISTING ACCESS GATE TO WILDWOOD RANCH
40. EXISTING TRAILER TO REMAIN
41. EXISTING CISTERN TO BE ABANDONED/INFILLED
42. FIRE BUFFER ZONE, TYPICAL
43. EXISTING STAFF HOUSING TO REMAIN

PROJECT OVERVIEW

TOTAL PROJECT AREA: 5718.0 ACRES
DEVELOPABLE PROJECT AREA: 284.2 ACRES
EXISTING BUILDING SQUARE FOOTAGE: 33,670 S.F.
PROPOSED BUILDING SQUARE FOOTAGE: 190,750 S.F.
TOTAL BUILDING SQUARE FOOTAGE: 224,320 S.F.
PARKING REQUIRED PER PARKING STUDY DATED 5/20/01: 188 SPACES
PARKING PROVIDED: 188 SPACES
OVERFLOW PARKING REQUIRED PER PARKING STUDY DATED 5/20/01: 111 SPACES
OVERFLOW PARKING PROVIDED: 112 SPACES

= NEW PAVED 24' WIDE ROAD

= EXISTING ROADS TO BE PAVED WITHIN EXISTING ROADBED TO 24'-0"

= EXISTING ROAD TO BE PAVED TO 21'-0" WITHIN EXISTING ROADBED DUE TO ENVIRONMENTAL CONSTRAINTS

= EXISTING ROAD TO BE WIDENED 10'-0" WITHIN EXISTING ROADBED DUE TO ENVIRONMENTAL CONSTRAINTS.

= EXISTING ROAD WIDTH TO REMAIN, ROAD TO BE PAVED.

= EXISTING ROAD WIDTH TO REMAIN, ROAD NOT TO BE PAVED

= EXISTING CULVERT. ROAD WIDTH TO REMAIN AT 20'-0". ROAD TO BE PAVED.

= AREA NOT CURRENTLY DEVELOPED OR PROPOSED FOR DEVELOPMENT UNDER MUP P70-378 W2

= OPEN SPACE EASEMENT AREA

North

Not to Scale

03/14/03

SOURCE: Matalon Architecture and Planning, 2003.

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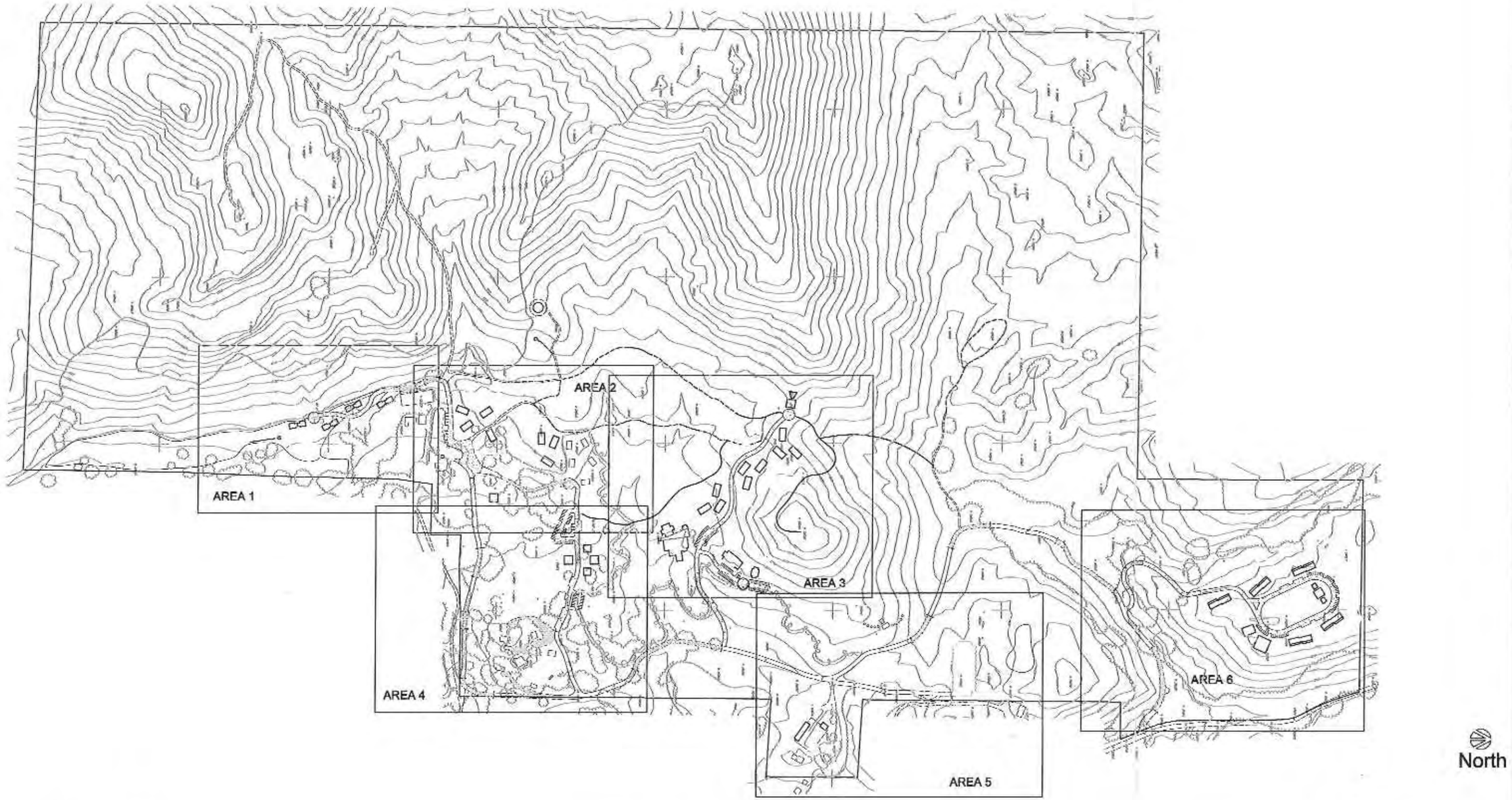
Salvation Army Divisonal Camp and Retreat

Proposed Site Plan

FIGURE 1-4



Not to Scale

11/04/02

SOURCE: Matalon Architecture and Planning, 2002.

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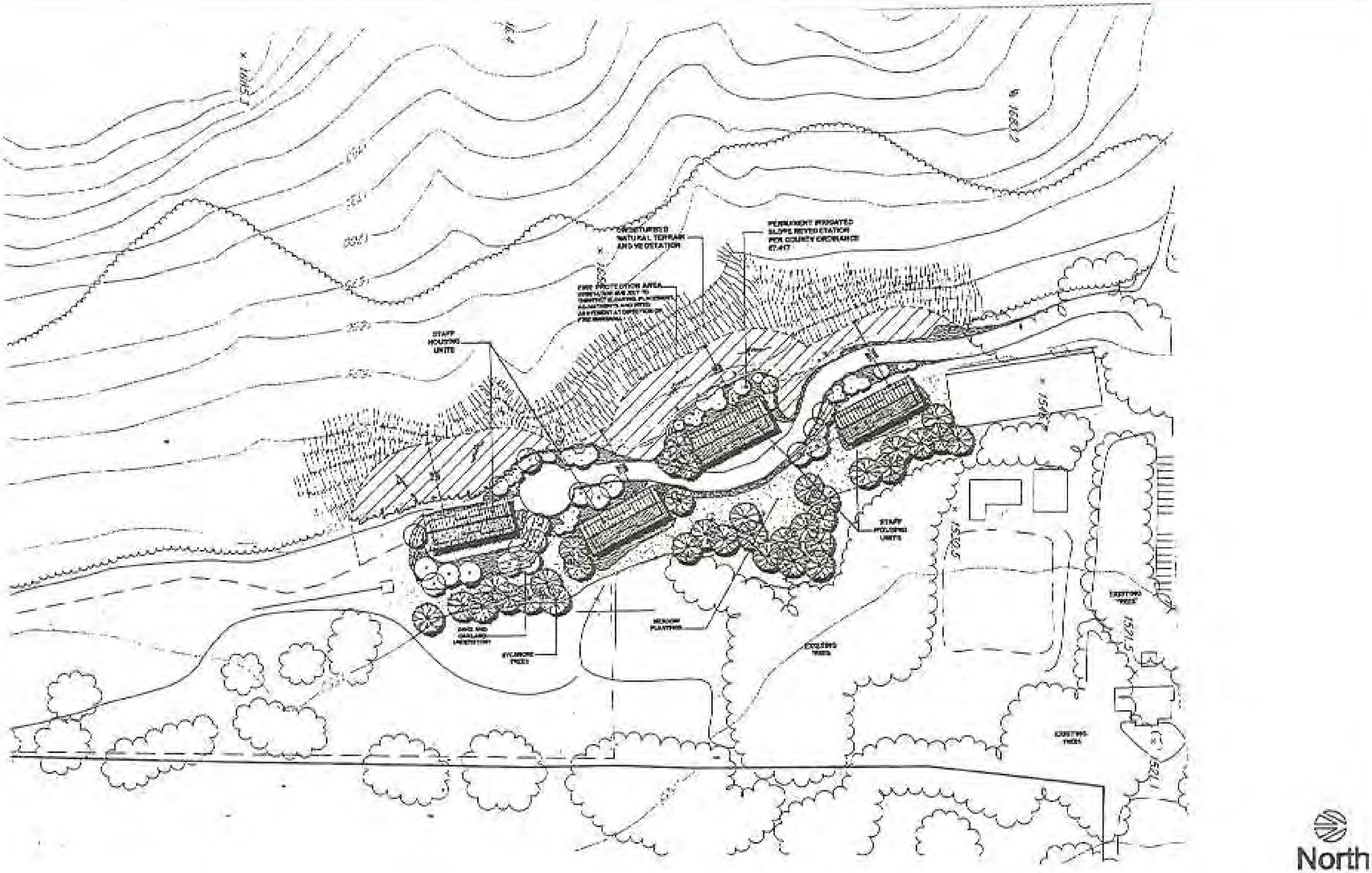
Salvation Army Divisional Camp and Retreat

Key to Enlarged Site Plan Areas

FIGURE 1-5



SOURCE: Matalon Architecture and Planning, 2002.

08/13/02

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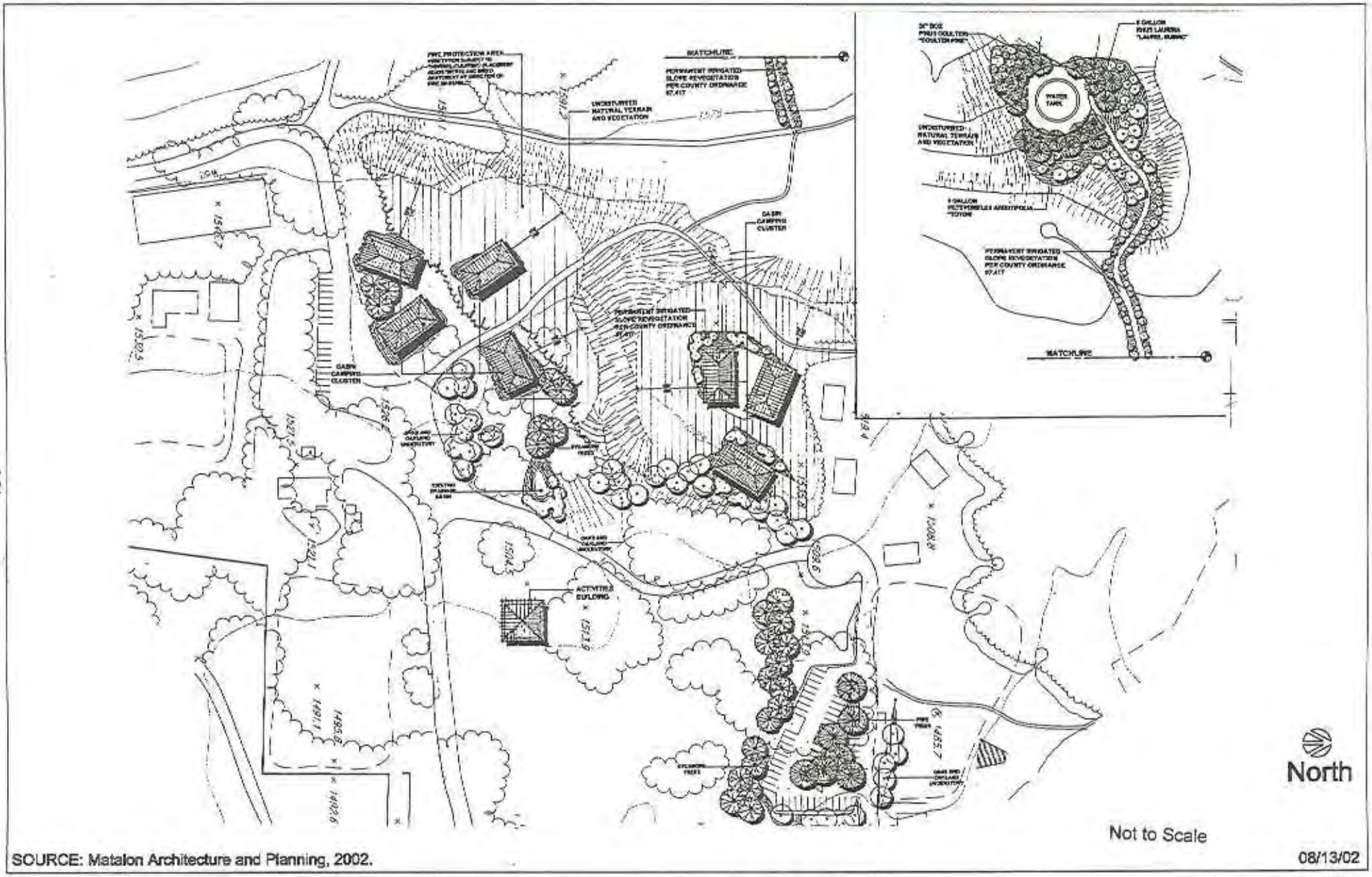
Salvation Army Divisional Camp and Retreat

Enlarged Planning Area One

FIGURE 1-6



SOURCE: Matalon Architecture and Planning, 2002.

08/13/02

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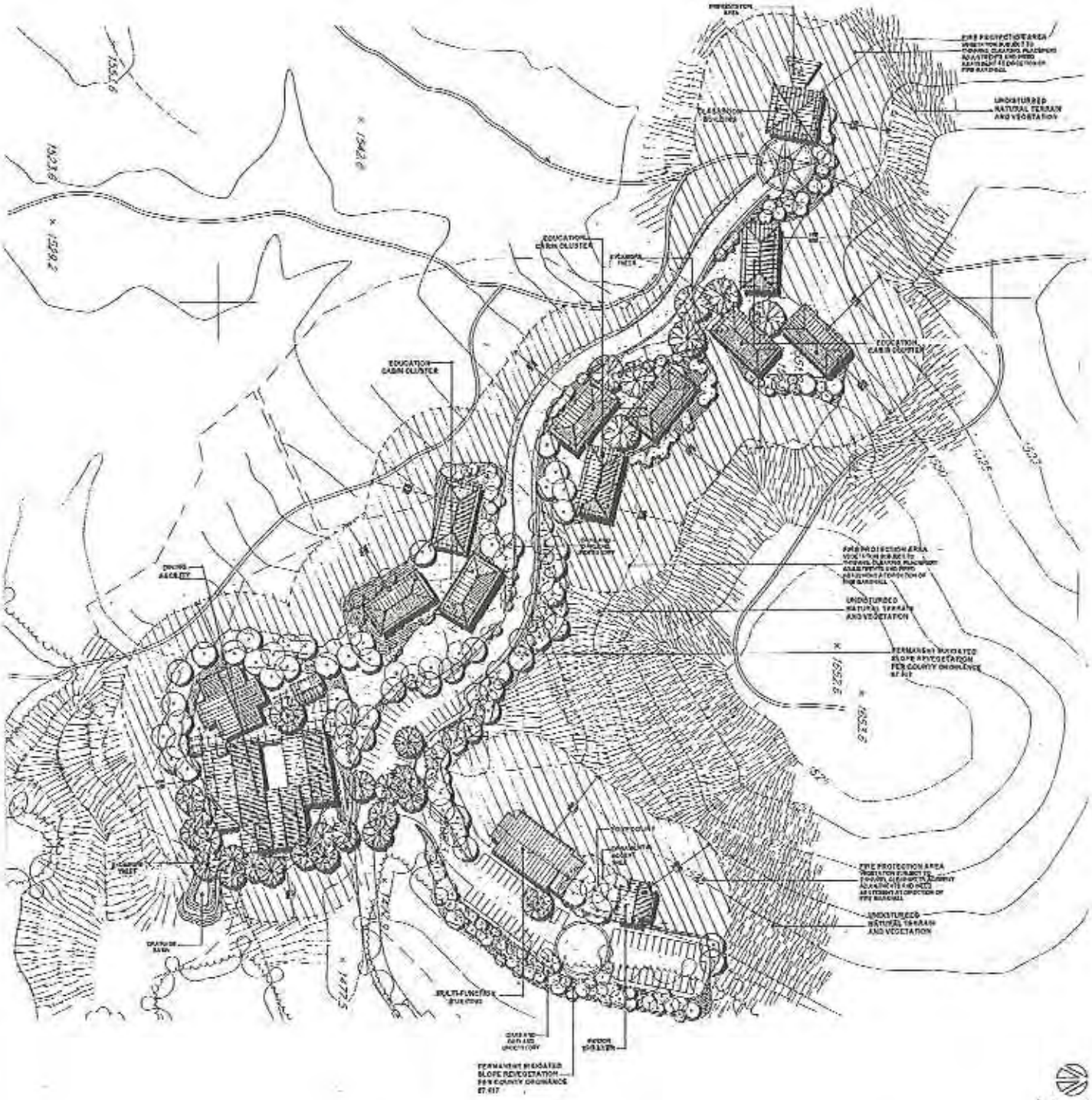
Salvation Army Divisional Camp and Retreat

Enlarged Planning Area Two

FIGURE

1-7



SOURCE: Matalon Architecture and Planning, 2002.

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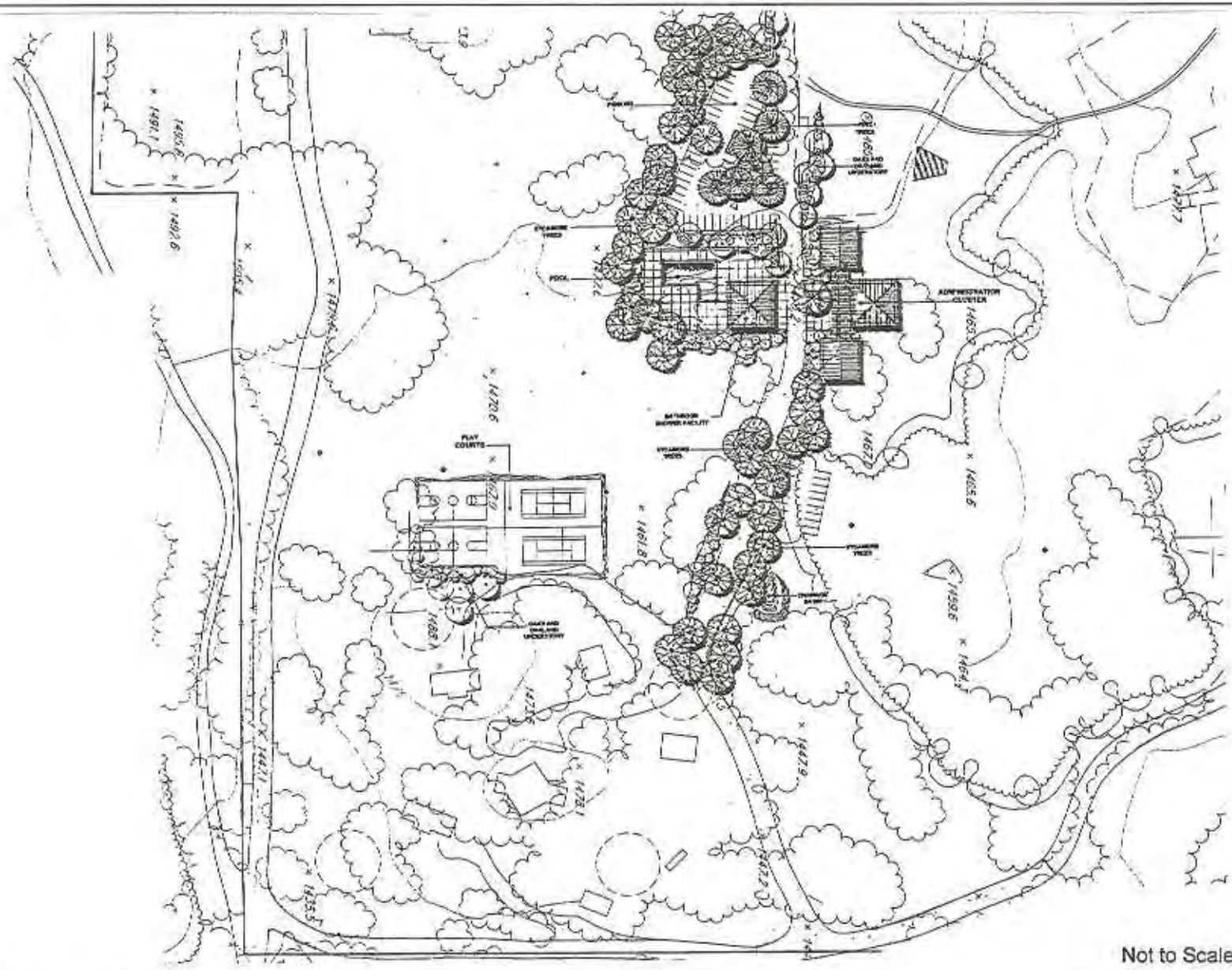
Salvation Army Divisonal Camp and Retreat

Enlarged Planning Area Three

FIGURE 1-8



SOURCE: Matalon Architecture and Planning, 2002.

08/13/02

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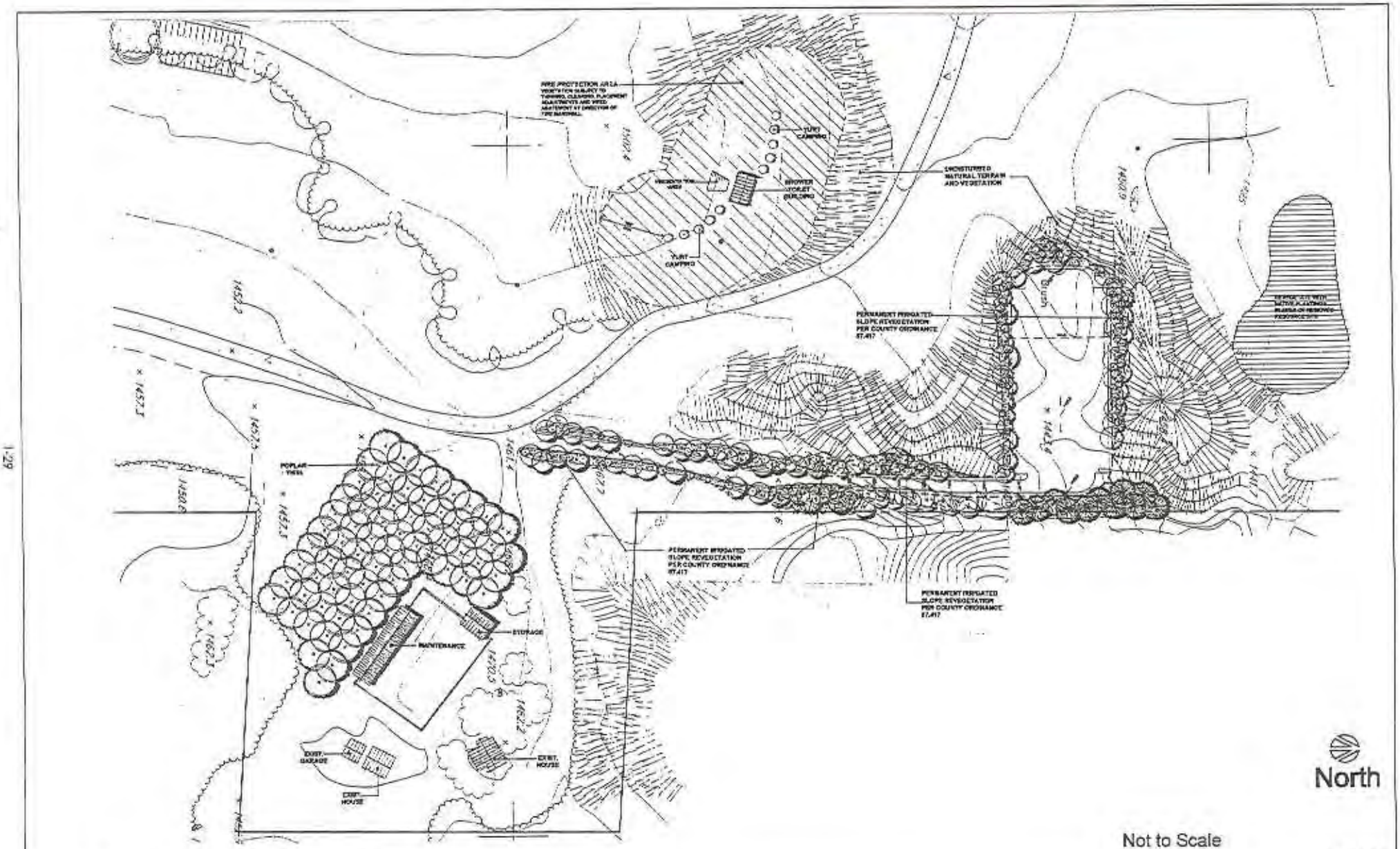
Salvation Army Divisional Camp and Retreat

Enlarged Planning Area Four

FIGURE

1-9



SOURCE: Matalon Architecture and Planning, 2002.

08/13/02

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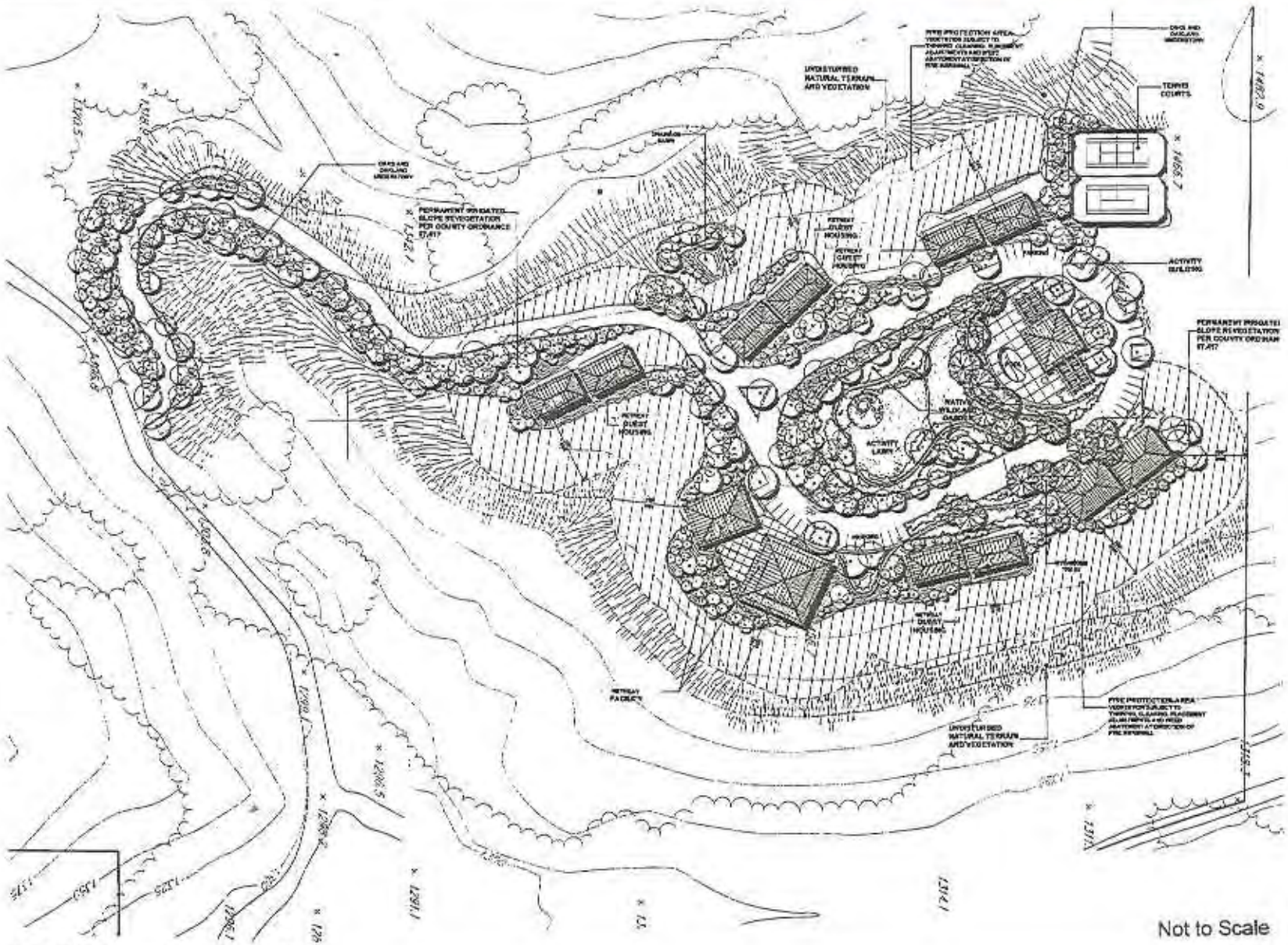
Salvation Army Divisional Camp and Retreat

Enlarged Planning Area Five

FIGURE 1-10



SOURCE: Matalon Architecture and Planning, 2002.

08/13/02

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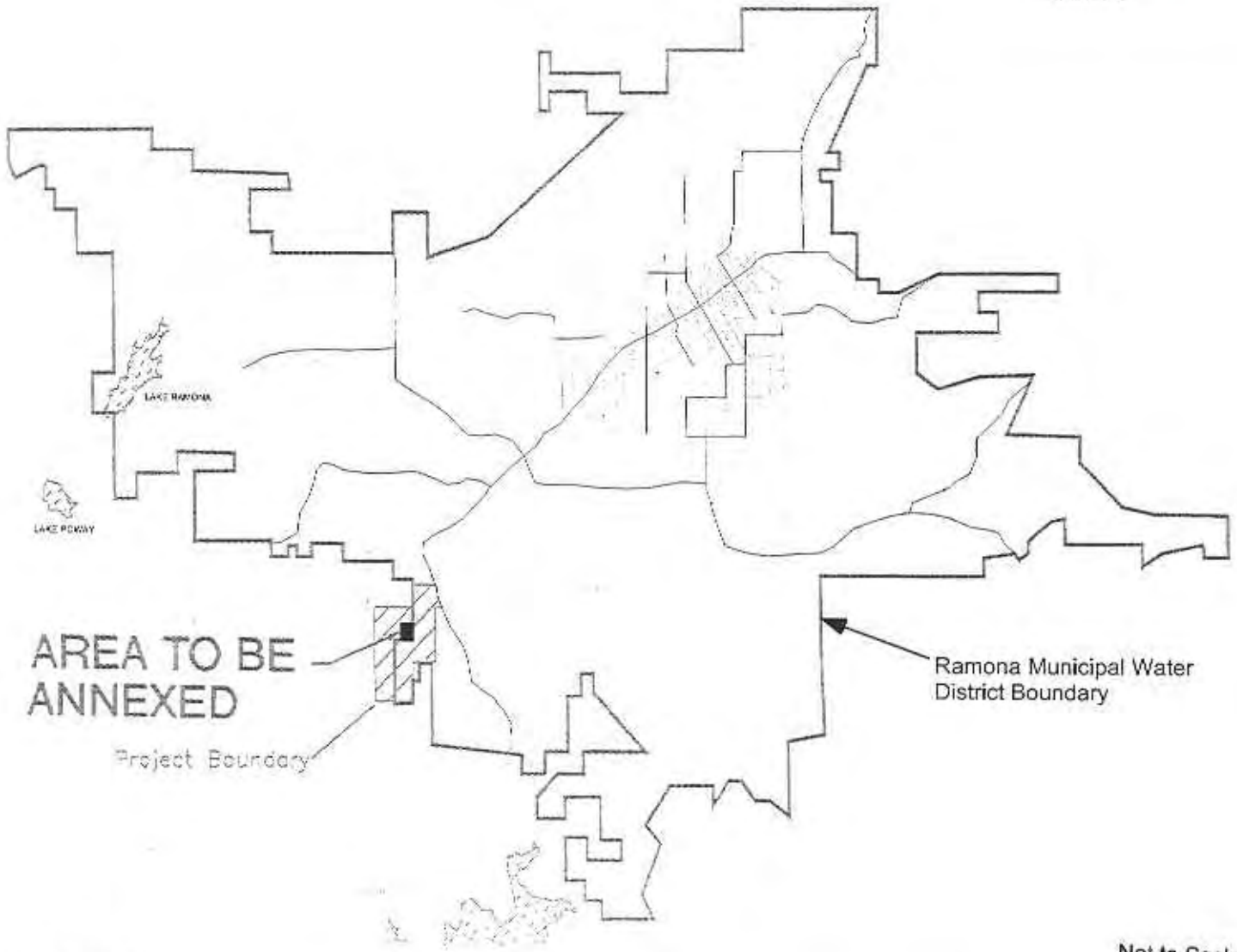
Salvation Army Divisional Camp and Retreat

Enlarged Planning Area Six

FIGURE

1-11



SOURCE: Nasland Engineering, 2002.

02/12/02

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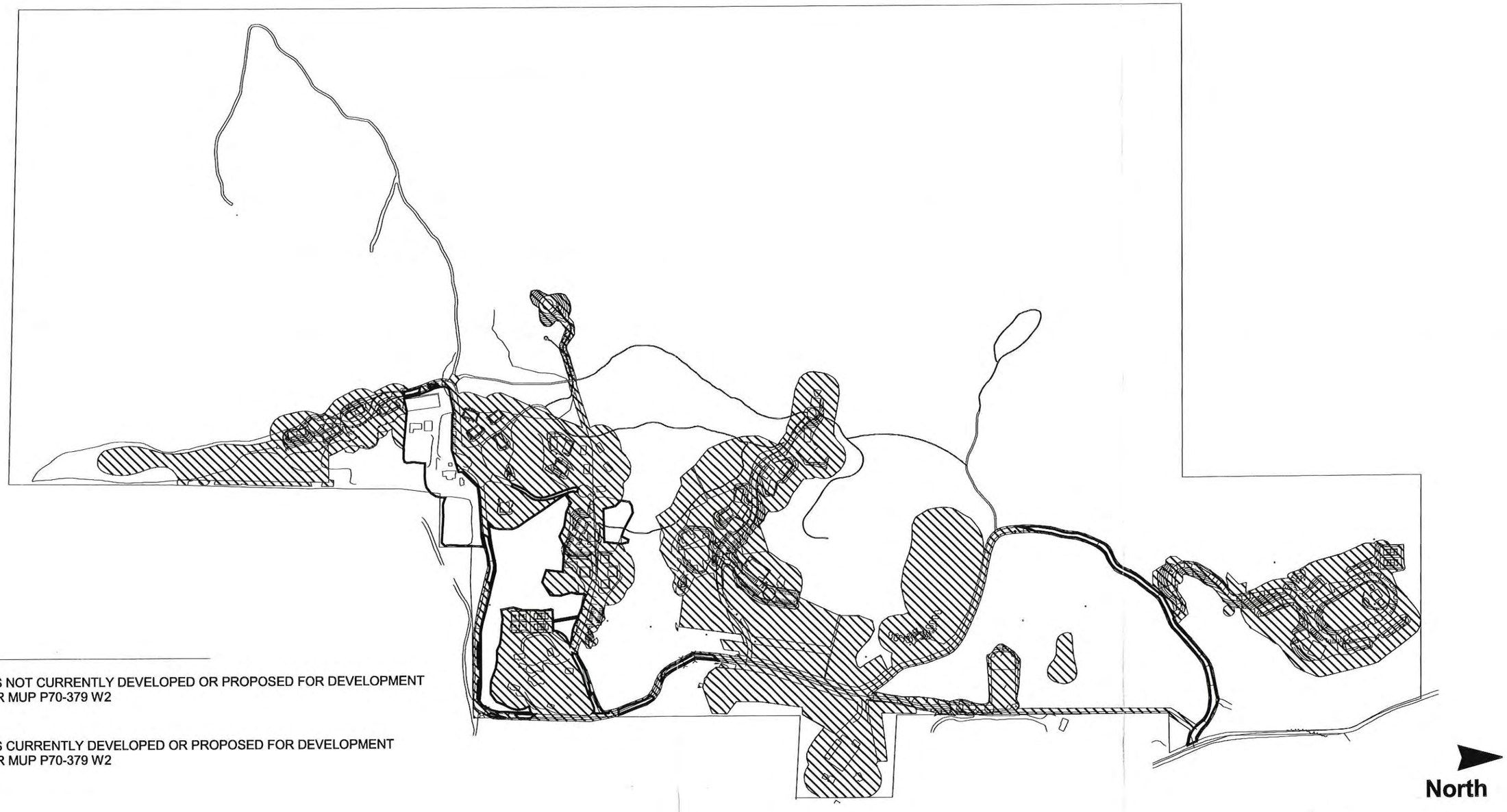
Salvation Army Divisional Camp and Retreat

Location of 10.8-Acre Project Site Area to be Annexed to the Ramona Water District

FIGURE 1-12



LEGEND

AREAS NOT CURRENTLY DEVELOPED OR PROPOSED FOR DEVELOPMENT UNDER MUP P70-379 W2

AREAS CURRENTLY DEVELOPED OR PROPOSED FOR DEVELOPMENT UNDER MUP P70-379 W2

North

Not to Scale

SOURCE: Matalon Architecture and Planning, 2003

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Salvation Army Divisional Camp and Retreat

Land Area to Remain Undeveloped Under The Proposed Project

FIGURE 1-13

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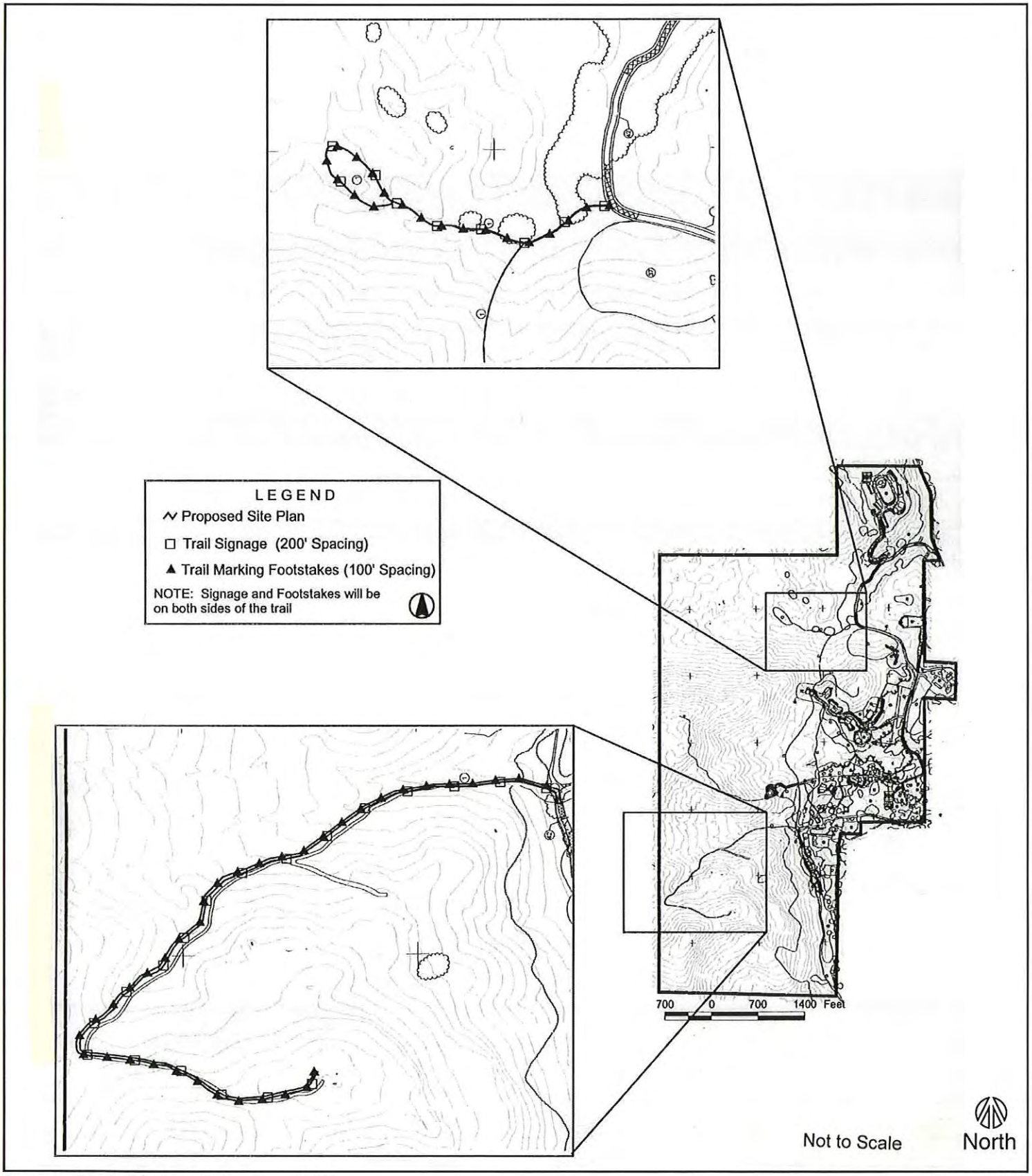

Source: Merkel & Associates, Inc., 2003.

3/20/03

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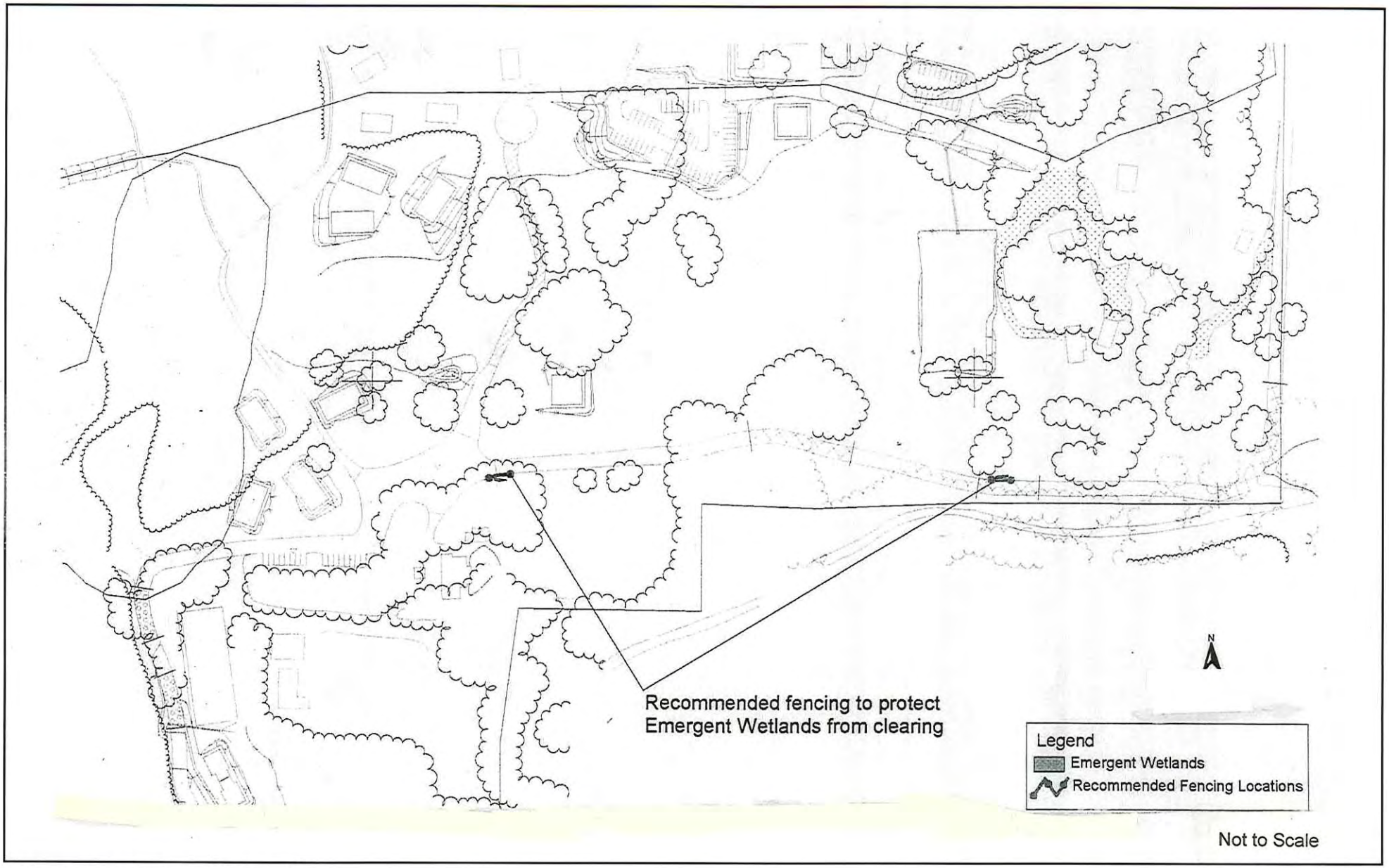
Salvation Army Divisional Camp and Retreat

Trail Signage and Foot Stake Locations

FIGURE 1-14



SOURCE: Merkel & Associates, Inc., 2002.

02/12/01

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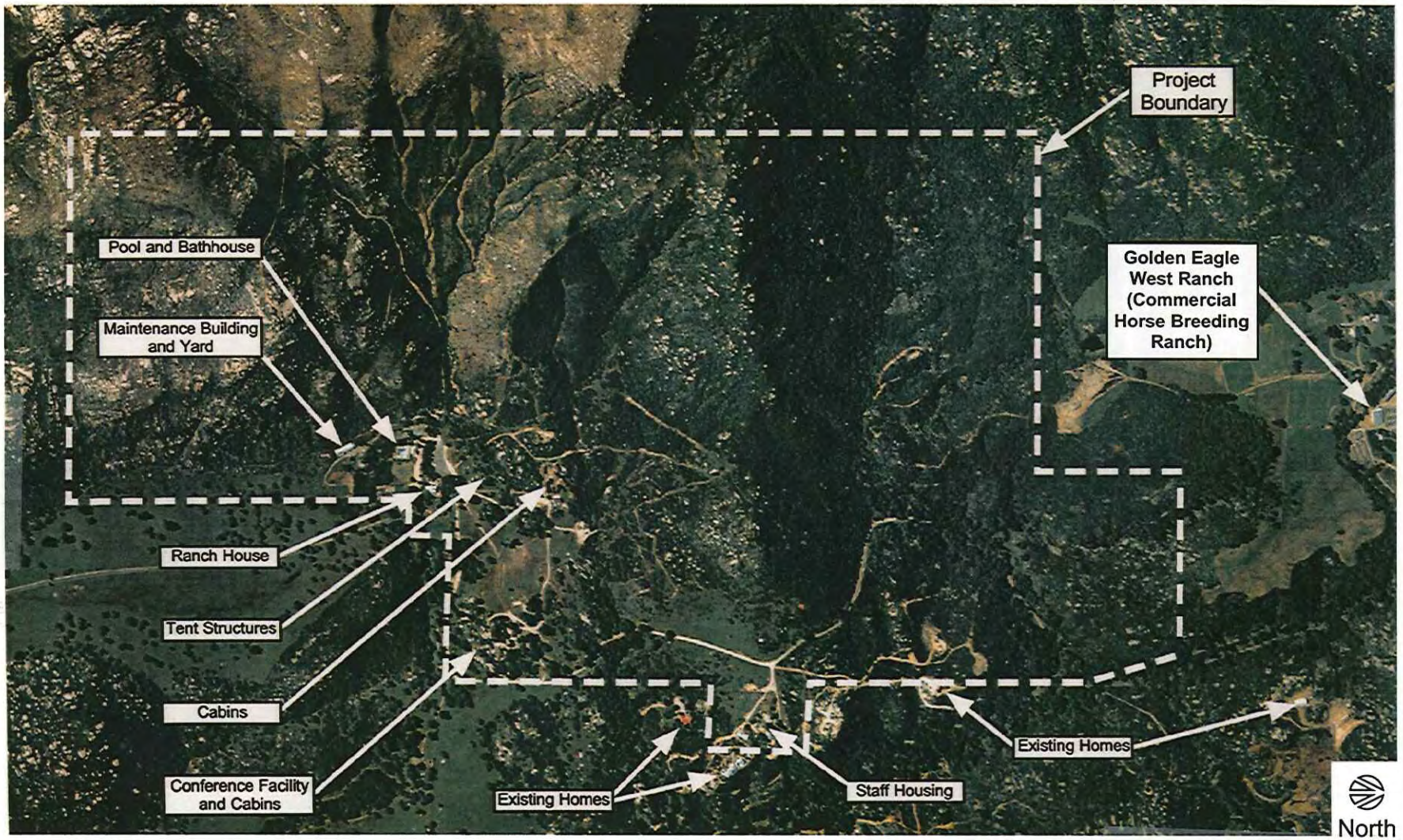
Salvation Army Divisional Camp and Retreat

Fencing Locations

FIGURE 1-15



SOURCE: BRG Consulting, Inc., 2002.
BASEMAP: Aerial Fotobank, Inc., 1/18/97.

Not to Scale

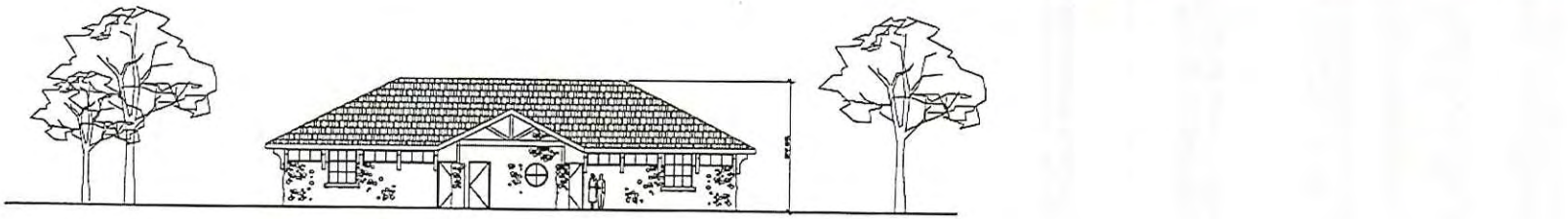
02/19/02

BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Aerial View of Project Site

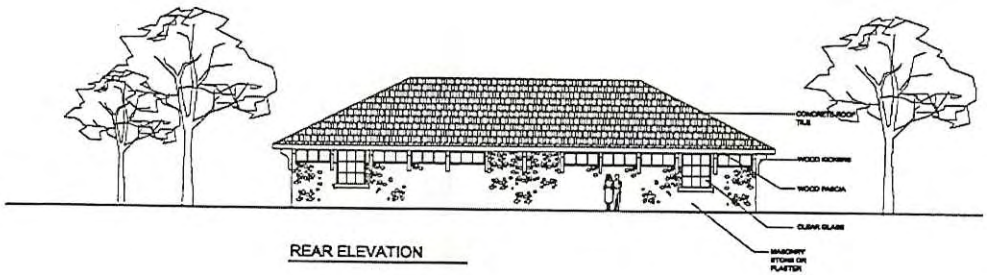
FIGURE 1-16



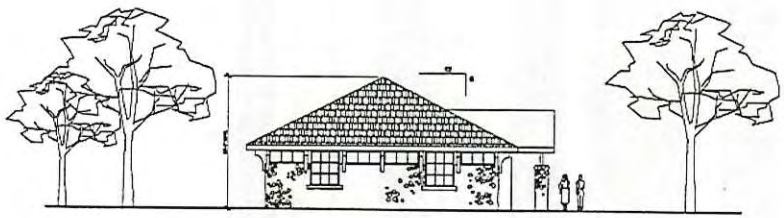
FRONT ELEVATION

SIDE ELEVATION

CABIN (TYPICAL)



REAR ELEVATION



SIDE ELEVATION

Not to Scale

SOURCE: Matalon Architecture and Planning, 2002.

2/11/02

BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Architectural Elevation of Proposed Cabins

FIGURE 1-17

TABLE 1-1
Project History

	May 1998 Community Review	Aug. 1998 1st Submittal	May 1999 2nd Submittal	June 2000 3rd Submittal	June 2001 4th Submittal	Feb. 2002 5th Submittal	Aug. 2002 6th Submittal	July 2003 County Counsel Submittal
Maximum Occupancy	1,000 People	820 People	789 People	789 People	778 People	748 People	748 People	748 People
Buildings	75 (±)	75 (±)	70 (±)	70 (±)	65 (±)	65 (±)	65 (±)	65 (±)
Water Supply	8" line in Mussey Grade	8" line in Mussey Grade	8" line in Mussey Grade	8" line in Mussey Grade	250,000 gallon on-site water storage tank	250,000 gallon on-site water storage tank	260,000 gallon on-site water storage tank	260,000 gallon on-site water storage tank
Waste Handling	Septic	Septic	Pack Bed Filter System	Pack Bed Filter System	Septic	Septic	Septic	Septic
Remote Camping	Improvements to Existing + 2 Additional	Improvements to Existing + 2 Additional	Improvements to Existing + 2 Additional	Improvements to Existing + 2 Additional	Improvements to Existing	None	None	None
R.V.'s	35 Vehicles w/Hookups Shower Bldg.	35 Vehicles w/Hookups Shower Bldg.	15 Vehicles No Hookups No Shower Bldg.	15 Vehicles No Hookups No Shower Bldg.	15 Vehicles No Hookups No Shower Bldg.	None	None	None
Application	None	MUP Modification (Mit. Neg. Dec.)	MUP Modification (Mit. Neg. Dec.)	MUP Modification (EIR/Specific Plan)	MUP Modification (EIR/Specific Plan)	MUP Modification (EIR/Specific Plan)	MUP Modification (EIR/Specific Plan)	MUP Modification (EIR)

Source: Salvation Army, 2002 and BRG Consulting, Inc., 2003.

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2.0 SIGNIFICANT ENVIRONMENTAL EFFECTS

2.1 Geology/Soils

No changes to this section have been made since the February 2005 Draft EIR. Therefore, this section is not provided in this Revised Draft EIR.

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2.2 Biological Resources

Section 2.2 Biological Resources has been revised to reflect the County's recently amended Resource Protection Ordinance. The amended RPO language affects primarily the discussion and analysis of wetlands on-site. The total area of County jurisdictional wetlands on-site has decreased as a result of the 2007 changes to the definition of an RPO wetland. On-site drainages were resurveyed by Merkel & Associates in 2007. Impacted wetland acreages were modified based on the change in characterization of wetlands on-site as a result of the amended RPO. The discussion of Wildlife Corridors was amended in responses to public comments on the DEIR. Impacted upland acreages were modified based on the increased fuel management zone requirements. The increased fuel management requirements are recommended in the Fire Protection Plan (see Section 2.3 Hazards and Hazardous Materials). It should be noted that the change in the impact acreages, as a result of expanded fire clearing, apply only to the Reduced Alternative I and Alternative II. Mitigation Measures 2.2c, 2.2d &e, and 2.2f &g were modified to reflect the revised wetland and upland impacts. Also, Mitigation Measure 2.2.f & g was modified to reflect the increase in the proposed open space configuration. Table 2.2-1 was modified to reflect the revised wetland impacts and required mitigation. Table 2.2-2 was modified to reflect the revised BMO required mitigation and open space constituents.

This biological resources discussion is a summary of the Salvation Army Divisional Camp and Retreat Biological Report prepared by Merkel & Associates, Inc. (Merkel & Associates, ~~2005~~ 2008 [EIR Appendix B]). New survey work was conducted by Merkel & Associates, Inc. in 2007. Wetlands and wetland buffers were re-examined relative to the 2007 Resource Protection Ordinance.

2.2.1 Existing Conditions

The project site is comprised primarily of southern mixed chaparral but also supports several sensitive vegetation communities, particularly a high quality southern coast live oak riparian forest. Two hundred eighty-eight species of plants were within the site area, supporting a variety of animal species. The substantial floristic diversity represented on-site reflects the variety of habitats and microhabitats present, the relatively large size of the property, and the intermediate geographic location of the site between the coast and higher mountains.

The project site supports a variety of species typically associated with chaparral, sage scrub, and oak woodland habitats within the region. Most notable of these are Englemann Oak, San Diego Horned Lizard, Orange-throated Whiptail, Cooper's Hawk, Red-shouldered Hawk, Southern California Rufous-crowned Sparrow, and Mule Deer.

2.2.1.1 Vegetation Communities

The following vegetation communities were delineated on the project site (See Figures 2.2-1 through 2.2-11):

Coast Live Oak Woodland - Approximately 20.34 acres of Coast Live Oak Woodland occur within the project site. Excellent stands of Coast Live Oak Woodland with two species of large oaks occur on the site.

Coast Live Oaks are the dominant component of the habitat, which occupies the flatter meadows. In addition, Engelmann Oaks are interspersed with Coast Live Oaks throughout the Camp.

Coastal Sage-Chaparral Scrub - Approximately 46.23 acres of Coastal Sage-Chaparral Scrub occur on the project site. A mix of sclerophyllous (stiff-leaved wood plants with evergreen foliage that retains water), woody chaparral species and drought-deciduous, malacophyllous (fleshy-leaved water storing plants) sage scrub species characterize this habitat. Areas mapped as coastal sage-chaparral scrub on-site contain predominately chaparral associated species with irregular sage scrub species presence.

Southern Mixed Chaparral - Approximately 402.55 acres of Southern Mixed Chaparral occur on the project site. In general, this habitat can be described as a relatively tall plant community dominated by broad-leaved, deep-rooted, woody shrubs. It occurs on dry, rocky, often steep slopes with sparse soils. Shaded north-facing slopes are generally where the densest vegetation occurs, while south-facing slopes are more open. Chaparral dominates the higher elevations on the Camp ~~site~~. ~~In many locations,~~ Prior to the Cedar Fire, a dense impenetrable canopy ~~is~~ was formed by woody shrubs such as Scrub Oak, Mission Manzanita, Whitebark Lilac, Holly-leaf Cherry, and Chamise; however, the Cedar Fire decreased chaparral scrub density throughout the Camp. Included in this vegetation are infrequent individual Coast Live Oaks, as well as Our Lord's Candle, Spanish Bayonet, Climbing Bush Penstemon, and Desert Elderberry. Occasionally within the understory of the chaparral are herbaceous species such as Peony and Pacific Sanicle.

Mafic Southern Mixed Chaparral - Approximately 6.48 acres of Mafic Southern Mixed Chaparral occur on the project site (see Figures 2.2-8 and 2.2-10). Southern Mixed Chaparral accounts for most of the on-site chaparral, but it is replaced in some of the higher elevations with Mafic Southern Mixed Chaparral. This subtype is typically differentiated from Southern Mixed Chaparral based upon soil type, as floristic distinctions between subtypes are not clearly defined. The Friant soils, which are known to support Mafic Southern Mixed Chaparral species, were not mapped in all of the Camp areas delineated as Mafic Southern Mixed Chaparral (Bowman et al. 1973). However, Soil Conservation Service maps are gross in nature and may not reflect smaller scale soils variations. Portions of the on-site chaparral habitat were designated as Mafic Southern Mixed Chaparral due to the presence of plant species typically associated with the soils, which support Mafic Southern Mixed Chaparral. The on-site area mapped as Mafic Southern Mixed Chaparral has been reduced to more closely follow the pattern of plant species associated with this vegetation community.

Diegan Coastal Sage Scrub - Approximately 16.43 acres of Diegan Coastal Sage Scrub occur on the project site. The vegetation community includes a dominance of low, soft-woody sub-shrubs that are typically drought deciduous. California Sagebrush and Flat-top Buckwheat are most common with significant incursions of Laurel Sumac and White Sage. The Diegan Coastal Sage Scrub understory includes Coastal Deerweed, Caterpillar Phacelia, and non-native grasses. Sage scrub occurs in the Camp's southeastern region, in the central eastern region, and to a lesser extent in the northeast.

Disturbed Land/Habitat - Approximately 16.58 acres of Disturbed Land/Habitat occur on the project site. Disturbed habitats on the site include the areas around the existing development that have been historically cleared or brushed and are maintained through a similar regime, as well as areas that were

more recently grubbed or cleared. The areas mapped as Disturbed do not include the Non-native Grasslands associated with existing development or areas. ~~which appear to have value to sensitive wildlife.~~

Emergent Wetland - Approximately 0.03 acre of Emergent Wetlands occur within the project site. Herbaceous wetland~~s~~ occupies~~y~~ isolated portions of non-native grasslands, which appear to have been historically disturbed.

Mule Fat Scrub - Approximately 0.02 acre of Mile Fat Scrub occur within the project site (see Figures 2.2-8). This riparian community is characterized by Mule Fat. It persists along intermittent stream channels with fairly coarse substrate and moderate depth to the water table. On-site this habitat in limited to one location near the base of the "cross trail". This small area of wetland is surrounded by non-native grasses and other species indicative of disturbance to the northeast, and Southern Mixed Chaparral to the west.

Non-Native Grasslands - Approximately 22.83 acres of Non-native Grasslands occur ~~within~~ in patch sizes varying from 0.001 acre to 3.01 acres in the central portion of the project site. Non-native Grasslands are well distributed in the central portion of the site. Such communities develop most commonly where native scrub has been disturbed by grazing, discing, or fire. On-site Non-native Grasslands are limited in size and ~~appear to be~~are disturbed on an on-going basis through mowing.

Non-Native Woodland - Approximately 4.39 acres of Non-native Woodland occur on the project site. Groves of Eucalyptus trees and Mission Olives occur within developed portions of the site. Understory plants are generally absent from these stands. Additional non-native tree species include Cypress, Juniper, California Incensecedar, Pine, and Thread Palm. All of these are located within Disturbed or developed portions of the Camp.

Rock Outcrops - Rock outcrops are considered sensitive habitat by the California Department of Fish and Game (CDFG) as listed in CNDDB. The acreage of rock outcrops is included in the vegetation type surrounding the rock outcrop. ~~Although not delineated individually as a habitat feature, large~~Large boulders, rock slabs, and outcrops are a dominant characteristic of the landscape. Rock outcrops increase habitat heterogeneity, which is positively correlated with species diversity. Rock Lotus, California Bee-Plant, Lady Fingers, Blood Onion, and Bigelow's Mossfern are associated with rock outcrops on the site.

Southern Coast Live Oak Riparian Forest - Approximately 33.63 acres of Southern Coast Live Oak Riparian Forest occur within the project site. Oak woodlands with considerable concentrations of Coast Live Oaks with scattered large Western Sycamores are concentrated within drainages on the Camp property forming bands of Southern Coast Live Oak Riparian Forest. ~~Found here are considerable concentrations of Coast Live Oaks with scattered large Western Sycamores.~~The density of the riparian oaks was decreased by the Cedar Fire, but they continue to form a riparian forest. Most of the on-site oaks damaged by the Cedar Fire have resprouted and appear to be in healthy condition; however, recruitment or the presence of seedlings or samplings has not been tracked. Oaks within the riparian corridor are typically mature trees.

Southern Willow Scrub - Approximately 0.73 acres of Southern Willow Scrub occur within the project site. Southern Willow Scrub consists of broad-leafed, winter-deciduous riparian thickets dominated by several

Salix species. The majority of the Southern Willow Scrub on-site occupies portions of the West Fork drainage. (See Figures 2.2-2, 2.2-3, 2.2-4, 2.2-6, 2.2-8, 2.2-9) However, following the Cedar Fire, Southern Willow Scrub has grown up within a drainage northwest of the existing cabin complex where a Non-Wetland Water dominated by Non-Native Grassland was previously mapped. The long-term viability of this area of willow scrub is unknown, but it is mentioned herein as it lies within open space that will be subject to management.

Urban/Developed Lands - Approximately 7.76 acres of project site are occupied by residences and Camp facilities, as well as roads, and parking areas. Exotic, ornamental plantings are associated with the project site.

A. Wetland Delineation

Determining Presence/Absence of Wetlands

The extent of wetlands, waters, and streambeds on-site was ascertained by conducting ~~a~~ jurisdictional wetland delineations in accordance with the routine on-site determination methods noted in the 1987 Army Corps of Engineers' (ACOE) Wetland Delineation Manual (Environmental Laboratory 1987). A jurisdictional wetland delineation uses three parameters to determine the presence/absence of wetlands, Non-wetland Waters of the U.S., and streambeds occurring on-site. Additional information on the overall delineation process and regulatory jurisdictions may be found in the federal delineation manual (Environmental Laboratory 1987), as well as through local, state, and federal enacting legislation, or through guidance provided by judicial interpretation, solicitors' opinions, and regulatory guidance. Initial wetland delineation work was conducted within the project footprint in May 2000. Additional wetland delineation work was conducted in December 2000, which covered areas outside of the proposed project footprint and compiled wetland delineation data for the remainder of the site. A more intensive wetland delineation was conducted in response to County staff comments and requests. The more intensive wetland delineation survey was performed December 17 through December 20 and December 26, 2001. Finally, the site was revisited in 2006 to photo document the conditions of all San Diego County jurisdictional wetlands and in 2007 to reassess jurisdictional wetlands following the adoption of the 2007 RPO, which altered the definition of County jurisdictional wetlands. While the purpose of the 2007 fieldwork was to re-assess County wetland jurisdiction under the 2007 RPO, all wetland locations and boundaries were checked and previously inaccessible areas were mapped. Mapping utilized a Global Positioning System (GPS) and/or updated aerial photograph, which provided a much clearer view of the drainages due to the loss of overstory and dense chaparral from the Cedar Fire.

The presence or absence of 3 parameters was assessed to determine if an area was a jurisdictional wetland: 1) hydrophytic vegetation, 2) wetland hydrology, and 3) hydric soils. These parameters are discussed additionally below. ~~The three parameters used in a jurisdictional wetland delineation are: vegetation, hydrology, and soils. Each of these parameters is discussed in more detail below.~~

Vegetation communities which meet the criteria of wetland-associated vegetation are dominated by a preponderance (>50 percent) of species classified as obligate wetland plants (OBL) (estimated probability

of occurring in wetlands, >99%), facultative wetland plants (FACW) (estimated probability of occurring in wetlands, 67% to 99%), or facultative plants (FAC) (estimated probability of occurring in wetlands, 33% to 67%) based on the National List of Plant Species that Occur in Wetlands (U.S. Fish & Wildlife Service 1988). ~~Obligate wetland plants are defined as occurring almost always in wetlands (estimated probability >99 percent) under natural conditions. Facultative wetland plants are defined as occurring usually in wetlands (estimated probability 67 to 99 percent). Facultative plants are defined as having a similar likelihood of occurring in both wetlands and non-wetlands (estimated probability 33 to 67 percent).~~

Wetland hydrology is indicated by the presence of surficial characteristics or sub-surficial hydric characteristics, showing that "presence of water has an overriding influence on characteristics of vegetation and soils due to anaerobic and reducing conditions, respectively." Surficial hydrology can be determined through visual observation of surface flow, drainage patterns, watermarks, and/or drift lines. Sub-surficial characteristics include saturated soils or presence of free water in the test pit.

Hydric soil indicators are present when soils "have formed under conditions of saturation, flooding or ponding long enough during the growing season to develop anaerobic conditions in the upper part (United States Department of Agriculture Natural Resources Conservation Service updated)." To ~~confirm~~ determine the presence/absence of hydric soils, samples taken from various depths are examined for physical and chemical evidence of hydric conditions. The color of excavated soils are evaluated using the chroma index from the Munsell Soil Color Charts (Munsell Color 1994). Low-chroma color or gleyed soils are indicators of hydric soils under normal conditions. Additional indicators of hydric soils such as vertical streaking, high organic matter content in the surface horizon, mottling, and sulfidic odor ~~are~~ were also evaluated during the delineation.

~~Areas defined as Non-wetland Waters of the U.S. or Streambed typically lack vegetation or are dominated by annual upland species, but exhibit wetland hydrologic characteristics.~~

Jurisdiction of Wetlands and Waterways

For this particular project site, wetlands and waterways fall under the jurisdictions of the ACOE, CDFG, and the County of San Diego (County). Each agency has a slightly different definition of "wetlands", and therefore, the extent of each agency's jurisdiction can vary. ~~During the delineation~~The extent of, jurisdictional ~~wetland~~ boundaries ~~were~~ was determined according to the ACOE, CDFG, and RPO ~~by each agency's~~ definition of a wetland. ~~, and t~~ This information was mapped accordingly, which is why there may be different jurisdictional acreage calculations for each wetland habitat.

U.S. Army Corps of Engineers Jurisdiction

Under Section 404 of the Clean Water Act, the ACOE has regulatory authority over the discharge of dredged or fill materials into the waters of the United States (1344 USC). The term "waters of the United States" is defined in 33 CFR Part 328(a) ~~and includes~~as: (1) all navigable waters (including all waters subject to the ebb and flow of the tide); (2) all interstate waters and wetlands; (3) all other waters such as intrastate lakes, rivers, streams, (including intermittent streams), mudflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect

interstate or foreign commerce; (4) all impoundments of water mentioned above; (5) all tributaries to waters mentioned above; (6) the territorial seas; and, (7) all wetlands adjacent to waters mentioned above. ~~Judicial interpretation under the U.S. Supreme Court ruling on the case of Solid Waste Agency of Northern Cook County (SWANCC) v. U.S. ACOE has narrowed the historic reading of jurisdiction under 33CFR 328.3(a)(3).~~

Wetlands are defined at 33 CFR 328.3(b) as "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support ... a prevalence of vegetation typically adapted for life in saturated soil conditions." To be considered a jurisdictional wetland under the ACOE, all three parameters (hydrophytic vegetation, hydric soils, and hydrology) must be met.

In the absence of wetlands and non-tidal waters, the limits of ACOE jurisdiction in non-tidal waters, such as intermittent streams extends to the ordinary high water mark (OHWM) which is defined at 33 CFR 328.3(e) as that line on the shore established by the fluctuation of water and indicated by physical characteristics such as clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.

California Department of Fish and Game Jurisdiction

The CDFG regulates alterations of "streambeds" through the development of a Streambed Alteration Agreement pursuant to Division 2, Chapter 6~~, Sections 1600-1603~~ of the Fish and Game Code. An Agreement is required whenever a project would "divert, obstruct or change the natural flow or bed, channel or bank of any river, stream or lake designated by the Department."

~~The breadth of areas subject to regulation by CDFG under Section 1600 et seq. are less clearly defined than those regulated by ACOE; however, in general, the policies are fairly consistent. It is clear that the California statutes cover all rivers, streams, lakes and streambeds that may exhibit intermittent flows of water, as well as wetlands that are directly associated with a streambed. However, Section 1600 et seq. does not extend to isolated wetlands and waters such as small ponds not located on a drainage course, wet meadows, vernal pools, or tenajas. Furthermore, CDFG jurisdiction does not extend over tidal waters.~~

~~Although "streambeds" are often used synonymously with "Non-wetland Waters of the U.S.", the breadth of the CDFG jurisdiction differs from ACOE in that it is not limited to the ordinary high water mark, but encompasses the entire width of the streambed from bank to bank regardless of the water level. Jurisdictional wetlands under CDFG only require one wetland parameter; however, the wetlands must be associated with, or adjacent to, a streambed. Furthermore, Section 1600 et seq. jurisdiction extends over all riparian habitat supported by a river, stream, or lake regardless of the riparian area's federal wetland status. Therefore, riparian areas that do not necessarily meet the hydrophytic vegetation criteria defined in the ACOE wetland delineation manual (Environmental Laboratory 1987) can still be considered jurisdictional under CDFG if they are associated with a streambed.~~

The breadth of jurisdiction under the CDFG differs from the ACOE in that a "~~"~~Streambed~~"~~" is not limited to the OHWM, but rather encompasses the entire width of the streambed, from bank to bank, regardless of water level. In addition, jurisdictional wetlands under the CDFG only require that one wetland parameter

be present, but the wetlands must be associated, within or adjacent, to a streambed. Furthermore, CDFG jurisdictional extends over "adjacent riparian habitat," including riparian habitat supported by a river, stream, or lake, even if the riparian area does not necessarily meet the hydrophytic vegetation criteria as defined by the ACOE.

~~Unlike the ACOE process, the Streambed Alteration Agreement is not a discretionary permit, but rather an Agreement developed between an applicant and CDFG with mitigation, impact reduction, or avoidance measures. These measures are subject to acceptance by the applicant or may be countered with alternative measures. If an Agreement cannot be reached between CDFG and the applicant, a formal arbitration process is available.~~

County of San Diego

~~The County regulates wetlands under their Resource Protection Ordinance (RPO). According to the RPO, wetlands include, "all lands which are transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or where the land is covered by water". The RPO further defines wetlands as "all lands having one or more of the following attributes: 1) at least periodically, the land supports predominantly hydrophytes; 2) the substratum is predominantly undrained hydric soil; or 3) the substratum is nonsoil and is saturated with water or covered by water at some time during the growing season of each year" (County of San Diego 1991). Similar to wetlands under the jurisdiction of CDFG, RPO wetlands only require one of the three parameters to be present; however, RPO wetlands are not limited to those that are associated with streambeds and can be isolated. Although it is never specifically stated in the RPO, the methods used to determine each of the three parameters is based upon the ACOE Wetland Delineation Manual per direction from County staff.~~

The County regulates wetlands under the RPO. Under the newly approved, 2007 RPO, the County has defined an RPO jurisdictional "wetland" as lands having one or more of the following attributes:

- At least periodically, the land supports a predominance of hydrophytes (plants whose habitat is water or very wet places);
- The substratum is predominantly undrained hydric soil; or
- An ephemeral or perennial stream is present, whose substratum is predominately non-soil and such lands contribute substantially to the biological functions or values of wetlands in the drainage system.

The RPO goes on to state, "Notwithstanding the paragraph (1) [above], the following shall not be considered "wetlands":

Lands which have attribute(s) specified in paragraph (1) solely due to man-made structures (e.g., culverts, ditches, road crossings, or agricultural ponds), provided that the Director of Planning and Land Use determines that they:

- Have negligible biological function or value as wetlands;
- Are small and geographically isolated from other wetland systems;

- Are not Vernal Pools; and,
- Do not have substantial or locally important populations of wetland dependent sensitive species.

RPO Wetlands

Passed in 2007, Ordinance No. 9842 (New Series), An Ordinance Codifying And Amending The Resource Protection Ordinance, Relating To Wetlands, Prehistoric And Historic Sites, Agricultural Operations, Enforcement, And Other Matters, revised the 1991 County RPO definition of a "wetland". The revised definition of a wetland is less inclusive than the 1991 RPO definition. As a result, some areas previously delineated as County jurisdictional wetlands may no longer qualify as RPO wetlands and may not be subject to the RPO development restrictions within wetlands and wetland buffers. Specifically, under the 1991 RPO, lands whose "substratum is non-soil and is saturated with water or covered by water at some time during the growing season of each year" would qualify as RPO wetlands. Under the revised 2007 definition of a wetland, such lands must support an ephemeral or perennial stream, whose substratum is predominately non-soil and such lands must contribute substantially to the biological functions or values of wetlands in the drainage system. Thus, the updated definition of a wetland is based not solely on form but on functions and values.

In the case of the Camp, the majority of the areas previously delineated as County RPO jurisdictional wetlands meet the 2007 definition of a wetland (based on the presence of hydrophytic vegetation or their contributions of the functions and values of the drainage system). In contrast, 2 areas previously delineated as RPO wetlands do not qualify as wetlands under the 2007 definition. The Central Camp Tributary Drainage and Southern Camp Drainages contain ephemeral drainages within the existing camp use area. These drainages lack hydrophytic vegetation, are not part of a wildlife corridor, and do not support any sensitive species. In terms of functions and values, these are narrow drainages that lack herbaceous vegetation within the channel; thus, they tend to flow quicker, yielding significantly less groundwater recharge, sediment retention, toxicant retention, and nutrient transformation. These drainages, thus, have low physical and chemical functions. In addition, the Southern Camp Drainages lack connectivity, precluding any substantial contributions to the drainages system.

The Central Camp Tributary Drainage and Southern Camp Drainages function solely to convey water from higher elevation lands in the west eastward, in some cases connecting with lower drainages; however, this function is the result of topography and is not dependant upon the specific morphology of the drainage. The water flow of the site's western hills will continue to flow eastward regardless of the presence or absence of these small, unvegetated channels; thus, their conveyance of water does not qualify as a substantial contribution to the biological functions or values of wetlands in the drainage system. They support a purely physical function, which is not dependent upon their presence, but simply reflects the path of least resistance for water flow. Absence of these drainages (while not proposed by the project) would not prevent flow of water eastward into the drainage system.

Having analyzed the conditions of the drainages on-site, the Central Camp Tributary Drainage and Southern Camp Drainages do not qualify as County wetlands pursuant to the 2007 RPO.

The RPO defines ~~W~~wetland buffers ~~are defined~~ as, "lands which provide a buffer area of an appropriate size to protect the environment and functional habitat values of the wetland, or which are integrally important in supporting the full range of the wetland and adjacent upland biological community." ~~(County of San Diego 1991).~~ In terms of buffer widths, the RPO states that they shall be 50 to 200 feet from the edge of the wetland as appropriate based on the above factors, and where oak woodland occurs adjacent to the wetland, the buffer shall include the oak woodland (not to exceed 200 feet). The RPO regards these buffer areas much the same way as wetlands, by restricting development to only a few permitted uses. There is no "buffer" required of oaks. All oaks adjacent to a wetland must be contained within the wetland buffer (not to exceed 200 feet). ~~According to DPLU policy, the width of wetland buffers are calculated based upon whether the wetland supports native hydrophytic vegetation, acts as a wildlife corridor, and/or supports any sensitive species.~~

The presence of native hydrophytic vegetation, a wildlife corridor, or sensitive species increase the need for wetland buffering due to increased functions and values of the wetland and the presence of sensitive or ecologically important features. One of these characteristics alone may not require a substantially larger buffer, but where all three occur buffering is expected to increase. The absence of such characteristics indicates a decreased need for buffering, as the drainage or hydrological feature's functions and values would be lower, possibly just water conveyance.

B. Wetland Habitats

On-site wetlands and waterways are separated into ~~five~~ four specific habitat types (Southern Coast Live Oak Riparian Forest, Mule Fat Scrub, Southern Willow Scrub, and Emergent Wetland~~, and Coast Live Oak Woodland~~) depending on the dominant species found in the area. Non-wetland Waters of the U.S. (jurisdictional under ACOE and County) and Streambed (jurisdictional under CDFG) are other categories that are used to describe jurisdictional waters that do not support wetland vegetation, but exhibit wetland hydrologic characteristics.

The acres of on-site wetlands have been tabulated according to habitat type and according to jurisdiction by each regulatory agency. Again, because each regulatory agency has a different definition of wetlands and different breadths of jurisdiction, the jurisdictional acreages tabulated for each agency can vary, overlap, encompass entirely separate areas, or be the same; it all depends on the physical characteristics found on-site.

ACOE, CDFG and County jurisdictional wetlands and waterways, as well as non-wetland Waters/Streambeds ~~of the U.S.~~, delineated for the proposed development area are shown on Figures 2.2-1 through 2.2-11. ~~2.2-2.~~

Jurisdictional non-wetland Waters/Streambed ~~of the U.S.~~ and four wetland vegetation types (Southern Coast Live Oak Riparian Forest wetlands, Southern Willow Scrub, Mule Fat Scrub, and Emergent Wetland) were identified within the study area. Approximately ~~1.46~~33.63 acres of jurisdictional Southern Coast Live Oak Riparian Forest wetlands exist on-site; approximately 0.73 acres of jurisdictional Southern Willow Scrub occur in the central portion of the site; approximately 0.02 acre (948 square feet) of jurisdictional Mule Fat Scrub occurs within the study area; and approximately 0.03 acre (1,414 square feet) of jurisdictional

Emergent Wetland occurs on-site. Finally, approximately ~~4.21~~4.75 acres of jurisdictional Non-wetland Waters are found on-site.

2.2.1.2 Sensitive Plant Species

Sensitive plants include those listed by USFWS, CDFG, the California Native Plant Society (CNPS) and/or the County of San Diego. Five sensitive plant species were identified within the camp property: Gander's Butterweed or Ragwort, Felt-leaved Monardella, Ramona Horkelia, Ashy Spike-moss and Engelmann Oak. MSCP covered plant species include Gander's butterweed and felt-leaved monardella.

Gander's Butterweed, Felt-leaved Monardella, and Ramona Horkelia are located in a high elevation chaparral community (Southern mixed chaparral) on the property. Each species was identified near the western trail that leads to a cross/scenic overlook. Gander's Butterweed was also identified in the northern portion of the project site, adjacent to an existing hiking trial. Ashy Spike-moss, in association with rock outcrops, is located throughout the site, particularly in the mid to high elevations. Engelmann Oaks are located throughout the property. The plant populations are primarily associated with the habitat openings created by the trail, but occur within native habitats on trail edges. Table 5 of the biological technical report (see EIR Appendix B) provides the approximate plant populations which range as low as three individuals counted of Gander's butterweed to abundant Ashy Spike-moss.

2.2.1.3 Sensitive Wildlife Species

Sensitive wildlife species include those listed by USFWS, CDFG, and those considered regionally or locally sensitive by the County of San Diego~~, local jurisdictions, and private groups.~~ Also within this list are MSCP-covered species. A number of sensitive species recorded in the area are expected to use portions of the site. Sensitive species observed or detected within the project site include San Diego Horned Lizard, Orange-throated Whiptail, Turkey Vulture, Cooper's Hawk, Red-shouldered Hawk, Southern California Rufous-crowned Sparrow, Western Bluebird, Northwestern San Diego Pocket Mouse, San Diego Desert Woodrat, and Mule Deer.

2.2.1.4 Existing Regulations

A. Multiple Species Conservation Program and Biological Mitigation Ordinance

The County has adopted the Multiple Species Conservation Program (MSCP), a comprehensive, long-term habitat conservation plan for southwestern San Diego County. The County implements the MSCP Plan through a subarea plan, which describes specific implementing mechanisms for the MSCP. The combination of the subregional MSCP and subarea plans serve as: 1) a multiple species Habitat Conservation Plan, pursuant to Section 10(a) of the federal Endangered Species Act; and 2) a NCCP Plan, pursuant to the California Natural Community Conservation Program (NCCP) Act of 1991 and the state Endangered Species Act. The MSCP and subarea plans allow for the incidental take of Covered Species as specified in the plan.

As part of the MSCP, the County of San Diego has entered into an Implementing Agreement with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Game (CDFG). The Implementing Agreement is the contract between the County and the wildlife agencies, which outlines the obligations

and commitments made for the successful completion of the MSCP. The Implementing Agreement allows the County of San Diego to grant Third Party Beneficiary Status to projects within its subarea that are consistent with the MSCP Subarea Plan, implementing regulations and guidelines. This, in turn, permits beneficiaries to take the habitat of sensitive plant and animal species covered under the County's MSCP Subarea Plan, in accordance with their specific conditions of project approval.

The Subarea Plan is divided into three Segments: Lake Hodges, Metropolitan-Lakeside-Jamul and South County. The project site is located in the Metropolitan-Lakeside-Jamul Segment. There are several critical or "core" biological resource areas identified in the Metro-Lakeside-Jamul segment that are targeted for preservation under the County's MSCP Subarea Plan. Biological core resource areas are high quality habitats that support a variety of sensitive species and provide connecting linkages to other habitats within and outside the MSCP preserve area.

The County also implements the MSCP through the County's Biological Mitigation Ordinance (BMO). The BMO "sets forth the criteria for avoiding impacts to Biological Resource Core Areas and to plant and animal populations within those areas, and the mitigation requirements for all projects requiring a discretionary permit. It is the policy of this Ordinance to promote the preservation of biological resources by directing preservation toward land which can be combined into contiguous areas of habitat or linkages. It is the further policy of this ordinance to give greater value to the preservation of large contiguous Biological Resource Core Area linkages when formulating avoidance and mitigation requirements."

Except for certain specified exemptions, the BMO applies to all land in the County within the boundaries of the MSCP, and the BMO applies to discretionary projects subject to CEQA, such as the proposed project. "No project requiring a discretionary permit shall be approved unless a finding is made that the project is consistent with the MSCP Plan, the County Subarea Plan and the provisions of this Ordinance." (BMO, Article II.)

Under BMO, Article V, Project Design, "impacts to land determined to be a Biological Resource Core Area shall be avoided to the maximum extent practicable by using the following design criteria:

1. Project development shall be sited in areas which minimize impact to habitat;

2. Clustering to the maximum extent permitted by County regulations shall be considered where necessary as a means of achieving avoidance;

3. Notwithstanding the requirements of the Slope Encroachment Regulations contained within the Resource Protection Ordinance, effective ~~October 10, 1991~~March 21, 2007, projects shall be allowed to utilize design which may encroach into steep slopes to avoid impacts to habitat;

4. The County shall consider reduction in road standards to the maximum extent consistent with the public safety considerations;

5. Projects shall be required to comply with applicable design criteria in the County MSCP Subarea Plan, attached hereto as Attachment G (Preserve Design Criteria) and Attachment H (Design Criteria for Linkages and Corridors).

Articles VI and VII of the BMO specify habitat-based and species-based mitigation requirements. However, before applying any mitigation, the project must be designed to avoid impacts to Biological Resource Core Areas (BRCA) "to the maximum extent practicable" by, among other things, locating the project in areas that minimize impacts to habitat."

The project site is located within the Central Poway/San Vicente Reservoir/North Poway Core Resource Area. To aid in conservation efforts, the USFWS and CDFG have identified pre-approved mitigation areas that overlay many of the core biological resource and linkage areas. The project site is located adjacent to two pre-approved mitigation areas that are north and south of the site. Although the site is not located within a Pre-Approved Mitigation Area (PAMA), it does qualify as a Biological Resource Core Area (BRCA) based on the BRCA criteria presented in the BMO (Article VI, A1).

Wildlife Corridors

The BMO defines "corridor" as a specific route that is used for movement and migration of species. A corridor may be different from a "Linkage" because it represents a smaller or more narrow avenue for movement. The BMO goes on to define "linkage" as an area of land which supports or contributes to the long-term movement of wildlife and genetic material.

Neither the County MSCP Subarea Plan nor the Poway Habitat Conservation Plan/Natural Communities Conservation Planning (HCP/NCCP) Subarea Plan identifies a corridor in this area. A map-based (GIS) analysis was conducted to identify potential on-site corridors. After considering the presence of high quality habitats, conducive topography, and human encroachment or development, field indicators were used to augment the map-based analysis.

Within the project region, there are several expansive, significant biological areas, which have been assessed as high quality habitat on the Habitat Evaluation Map contained within the County MSCP Subarea Plan. These areas include lands surrounding State Route 67 to the west of the project site, lands to the southwest (San Vicente Open Space Preserve), and lands to the southeast, which form a connection with the recently preserved Monte Vista Ranch lands. In the immediate project vicinity, these regional high quality habitat areas connect via the high quality oak riparian habitat associated with the West Fork of San Vicente Creek (County MSCP Subarea Plan Figure 4-1) and high to very high quality habitats that border the southeastern edge of the Camp.

Much of the topography that favors movement (canyon bottoms) also favors higher quality habitats; thus, likely movement routes delineated based on topography generally corresponded with the high quality linear habitat connections. In some cases, topography and habitats create a "dead-end" route, where drainages abut steep slopes; these areas are less likely to support wildlife movement. In the case of the Camp, existing on-site development in the central valley portion of the site and ranching development to the north and south, limit the likelihood of extensive north-south wildlife movement, despite the

advantageous topography. Thus, having examined regional connectivity potential, habitat quality, topography, and existing human development, the primary movement routes identified were east-west routes south of the Camp and along the West Fork of San Vicente Creek within the northern Camp property. Fieldwork conducted over several years supported designation of the West Fork of San Vicente Creek as a corridor. Through observation of tracks, scat, and individual mammals, bobcat, coyote, grey fox, and mule deer were identified as utilizing the West Fork corridor on-site. Although each of these species was also identified in other on-site areas, track abundance was higher at the West Fork-Mussey Grade Road connection than at other areas examined.

~~The area surrounding the project site is occupied by rural residential development interspersed with areas of native and semi-native habitats; except to the west, where the site abuts undeveloped open space. The remaining patches of native and semi-native habitats within the project vicinity, in conjunction with the open space to the west provide numerous potential movement avenues (local wildlife corridors), particularly along creeks and ridgelines.~~ The project site's contiguous riparian habitat oak woodlands, associated with the West Fork of San Vicente Creek, ~~serve as a~~ form the local corridor., ~~particularly those associated with the West Fork of San Vicente Creek.~~ This local corridor crosses Mussey Grade Road at the Camp entrance where an underpass, if utilized, permits the continued safe passage of wildlife to the southeast and provides evidence of local corridor use, in the form of tracks. To the east, this local corridor connects with the Iron Mountain Preserve lands. On-site corridors appear to be utilized by meso-predators, Bobcat, Coyote, and Mule Deer.

The Biological Monitoring Plan for the MSCP addresses regional versus local corridors. It states that *"regional corridors link two or more large areas of natural open space and are necessary to maintain demographic and genetic exchange between wildlife populations residing within these geographically disjunct areas. Local corridors allow resident animals access to necessary resources within a large habitat patch and they may function as secondary connections to the regional corridor system."* A regional corridor has not been identified on-site, as there is a lack of habitat connectivity to the north, east, and south of the site (regionally), due to residential development. ~~There is no regional corridor on the project site because there is insufficient habitat connectivity to the north, east, and south.~~ In addition, the on-site habitats are not necessary to maintain the viability of wildlife populations in the region. Specifically, rural residential development occupies the land eastward and additional development has been approved immediately east of Mussey Grade Road; north of the site, native habitats have largely been converted to agricultural use (Golden Eagle Ranch and other equestrian facilities in southern Ramona); and south of the site, limited agricultural and rural development combined with Mussey Grade Road's impacts on the riparian corridor and the topography (numerous steep north-south ridgelines) limit the suitability of the area for regional north-south wildlife movement. Finally, a more suitable (east-west) regional corridor exists to the south through the San Vicente Open Space Preserve.

Additional corridors were evident (through the presence of scat, predominantly Coyote) along some of the maintained and non-maintained trails. The use of a "least resistance route" with sufficient cover is expected. As no specific linear feature or habitat is associated with such "trail" routes they are likely advantageous movement avenues but not necessary corridors for daily or seasonal movement.

The MSCP and BMO contain design standards/criteria for corridors and linkages. Since the project site does not contain any linkages, only the criteria regarding corridors apply to the proposed project. Please refer to EIR Section 2.2.3.5 for a detailed discussion of project compliance with applicable criteria.

B. Resource Protection Ordinance

The purpose of the Resource Protection Ordinance (RPO) is to protect and preserve environmentally sensitive lands along with the County's unique topography, natural beauty, diversity, and natural resources, for current and future residents of the County of San Diego. The RPO defines "environmentally sensitive lands" as lands containing any of the following: 1) wetlands; 2) floodplains; 3) steep slopes; 4) sensitive habitats; and, 5) significant prehistoric and historic sites.

With respect to RPO defined environmentally sensitive lands relevant to biological resources, the project site contains wetlands and sensitive habitat lands. Please refer to the wetland delineation discussion above for RPO wetland and wetland buffer definitions. Each of these environmentally sensitive lands has particular development restrictions, which have been defined by the RPO. The only uses allowed in wetland areas under the RPO are restricted to the following~~:~~ "~~*not involving grading, filling, construction, or placement of structures:* 1)~~ *aquaculture, provided that it does not harm the natural ecosystem; 2) scientific research, educational or recreational uses provided that they do not harm the natural ecosystem;* *3) removal of diseased or invasive exotic plant species;* ~~*and 3*~~*4) wetland restoration projects where the primary function is restoration of the habitat and 5) crossing of wetlands for roads, driveways or trails/pathways*" (County of San Diego, 2007 ~~1991~~). Wetland buffers also have development restrictions, where the only allowable uses include the following: "~~*1) access paths; 2*~~*1) ~~other~~ improvements necessary to protect adjacent wetlands; and ~~3~~2) all uses permitted in wetland areas*" (County of San Diego, 2007 ~~1991~~). No uses or impacts other than those listed above are allowed within wetlands or their adjacent wetland buffers.

RPO regulates sensitive habitat lands as follows: "Development, grading, grubbing, clearing or any other activity or use damaging to sensitive habitat lands shall be prohibited. The authority considering an application listed at ~~Article III,~~ County Code Title 8, Division 6, Chapter 6, Section 86.603(a) ~~1 above~~ may allow development when all feasible measures necessary to protect and preserve the sensitive habitat lands are required as a condition of permit approval and where mitigation provides an equal or greater benefit to the affected species." (County of San Diego, 2007~~RPO, Article IV, Section 6~~). The RPO also states that sensitive habitat lands include the areas which are necessary to support a viable population of any rare or endangered species or sub-species as defined by CEQA Guidelines Section 15380 in perpetuity, or which is critical to the proper functioning of a balanced natural ecosystem, or which serves as a functioning wildlife corridor. Although the site does not qualify as a regional corridor or linkage pursuant to the MSCP/BMO, the site does contain a locally functioning wildlife corridor and therefore, qualifies as a sensitive habitat pursuant to RPO.

County Code Title 8, Division 6, Chapter 6, Section 86.604 ~~Article IV~~ of the RPO regulates sensitive lands, such as wetlands, wetland buffer areas and sensitive habitat lands, as explained above. However, RPO also states "that where the extent of environmentally sensitive lands on a particular legal lot is such that no reasonable economic use of such lot would be permitted by these regulations, than an encroachment into

such environmentally sensitive lands to the minimum extent necessary to provide for such reasonable use may be allowed."

This exception to allow encroachment into environmentally sensitive lands does not apply here. After applying RPO regulations to the project site, the applicant still has a reasonable economic use as shown by Reduced Alternatives I and II.

Approval of the proposed project requires a finding that the project is consistent with RPO. (County Code Title 8, Division 6, Chapter 6, Section 86.603~~RPO, Article III, Section 1~~).

2.2.2 Thresholds of Significance

Impacts to biological resources are assessed through the CEQA review. There would generally be a significant effect on biological resources if the project would:

- substantially affect an endangered, rare, or threatened species or the habitat of such a species;
- interfere substantially with the movement of any resident or migratory fish or wildlife species;
- substantially diminish habitat for fish, wildlife or plants;
- conflict with the County MSCP Subarea Plan/BMO; or,
- conflict with the County RPO.

These criteria are applicable for this analysis as they are based on approved federal, state and local legislation that are designed to preserve and protect biological resources.

2.2.3 Analysis of Project Effects and Determination as to Significance

The project impacts were assessed based on the originally proposed site plan for the preferred project (Figure 1-4). The analysis for Alternative I and Alternative II is provided in RDEIR Section 4.0 Project Alternatives. In addition, the following assumptions were utilized in calculating impacts to biological resources:

- Oaks within 25 feet of a proposed ground altering impact are considered impacted. Also, oaks within 25 feet of a ground disturbing impact, but outside the development bubble were considered impacted as a result of the development (except along existing roadways); and, although oaks may not be removed as a result of fire clearing, removal of the understory was considered an impact for oaks and oak woodland that qualify as a biological resource.
- Impacts associated with installation of a water line are limited to within the existing on-site road area where the line runs under the road. Outside of roadways, installation of the waterline is considered to result in a six-foot-wide direct impact to native vegetation and an indirect impact to oaks within 20 feet (pers. comm., Dickman, D. January 23,2003).
- For areas where proposed visitor facilities are adjacent to or in the immediate vicinity of existing visitor facilities, and no effective means of controlling or channeling foot traffic can be assured, a worst case impact footprint was delineated that includes the area between the facilities where

increased foot traffic and human associated disturbance are expected to alter the existing resources.

- Where staff housing is proposed or exists, an impact footprint that connects the proposed and existing facilities has not been delineated, as there would be no substantial change from existing conditions in terms of foot traffic.

The area considered impacted included all areas within the "development bubble," as drawn by Matalon Architecture and Planning and displayed on the plans, with the following exceptions:

- areas of existing development where no change is proposed and no new fire clearing is required (e.g., existing leach fields) were not considered as a new impact; and,
- areas of existing development where Coast Live Oak Woodland occurs within the existing developed area (e.g., between buildings) were not considered impactive to the oaks as a biological resource requiring mitigation (Dickman, 2001).

Impacts of the proposed project to on-site vegetation communities, including non-sensitive and sensitive habitats; wildlife corridors, sensitive plant species, and sensitive wildlife species were thoroughly investigated.

2.2.3.1 Vegetation Communities

A complete list of impacts to vegetation communities on-site is provided in Table 2.2-1. The MSCP/BMO classify wildlife habitats according to a four-tier system. Habitats are classified in order of decreasing sensitivity. Tier I habitats include wetlands and riparian habitats, oak woodlands and Mafic Southern Mixed Chaparral. Tier II habitats include Diegan Coastal Sage Scrub and Coastal Sage-Chaparral Scrub. Tier III habitats include Southern Mixed Chaparral and Non-native Grasslands. Finally, Tier IV habitats are disturbed lands, agricultural lands and eucalyptus or other non-native woodlands.

A. Tier I Habitats

1. Coast Live Oak Woodlands and Southern Coast Live Oak Riparian Forest

Both individual oaks and areas of oak woodland would be affected by the proposed project.

Impact 2.2.a The proposed project would impact 2.00 acres of Southern Coast Live Oak Riparian Forest. Approximately 0.04 acre of this impact would result from implementation of the Retreat Center and access road.

Impact 2.2.b The proposed project would impact 7.29 acres of Coast Live Oak Woodlands. Approximately 0.44 acre of this total would result from implementation of the proposed Retreat Center and access road.

~~Due to the size of the proposed project,~~Oak impacts are considered significant because of the high number of oak trees present on-site, the size of the project and the ~~varying~~ quality of oak woodland and forest habitat on-site as well as the sensitivity of oak habitats (i.e., County Tier I). ~~(which differs from outstanding in more pristine locations to fair to good in the areas impacted by prior campground development), oak impacts are~~ The impact to 2.00 acres of Southern Coast Live Oak Riparian Forest and 7.29 acres of Coast Live Oak Woodlands is considered significant.

2. Mule Fat, Southern Willow Scrub, Non-Wetland Waters of the U.S., and Emergent Wetlands

No impacts to Mule Fat Scrub or Southern Willow Scrub would occur with project implementation, therefore, impacts would be less than significant.

Impact 2.2.c The proposed project would impact 0.~~14~~ 17 acre of ACOE Non-wetland Waters of the U.S. that are County-jurisdictional (RPO) wetlands. Approximately 0.~~04~~ 05 acre of this total would result from construction of the Retreat Center access road and 0.~~10~~ 12 acre would result from human foot traffic throughout the remainder of the project site.

Emergent wetlands occur in two locations within the proposed project footprint on-site. Since Emergent Wetlands can be difficult to identify by the lay person it would be expected that without obvious delineation this area would be impacted during the course of construction or subsequent fire clearing. The project has incorporated permanent fencing and signage design elements and included requirements for construction fencing and monitoring relative to protection of this habitat. All of these avoidance measures are conditions of project approval (Section 1.1.1.2). The purpose of the temporary "construction" fencing and monitoring is to ensure that clearing, grading, and/or use or storage of heavy equipment does not occur within this sensitive habitat. The project includes permanent split-rail fencing at each of the two locations with signs identifying the area beyond as an "Environmentally Sensitive Area – No Admittance." The location of the fencing is illustrated in Figure 1-15. As such, impacts to emergent wetlands would not be significant.

Because the proposed project would impact wetlands, permits must be obtained from the ACOE and CDFG as discussed above. As noted in ~~s~~Section 1.1.1.2, Major Use Permit Approval Conditions, the applicant must provide evidence that all required state and federal wetland permits have been obtained.

B. Tier II Habitats

1. Diegan Coastal Sage Scrub

There has been a significant loss of this sensitive, native vegetation community throughout the County. Diegan Coastal Sage Scrub supports the California Gnatcatcher, a federally threatened species, as well as a host of other regionally or locally sensitive species. Impacts to Tier II habitats are considered significant.

Impact 2.2.d The proposed project would impact 13.12 acres of Diegan Coastal Sage Scrub. Approximately 0.94 acre of this impact would result from construction of the Retreat Center and access road.

2. Coastal Sage-Chaparral Scrub

Impact 2.2.e The proposed project would impact 9.26 acres of Coastal Sage-Chaparral Scrub. Approximately 1.08 acres of this impact would result from construction of the Retreat Center and access road.

C. Tier III Habitats

1. Southern Mixed Chaparral

Impacts to Southern Mixed Chaparral are considered significant due to its regional decline and habitat value for sensitive species.

Impact 2.2.f The proposed project would impact 37.36 acres of Southern Mixed Chaparral. Approximately 4.48 acres of this impact would result from construction of the proposed Retreat Center and access road.

2. Non-native Grasslands

Impact 2.2.g The proposed project would impact 12~~.33~~45 acres of Non-native Grasslands. Approximately ~~0.40~~0.04 acre of this impact would result from construction of the Retreat Center and access road and 0.41-acre would result from implementation of Mitigation Measure 2.2c, which requires the creation of on-site wetlands.

D. Tier IV Habitats

1. Non-native Woodland, Disturbed Habitat and Urban/Developed Lands

The proposed project would impact 1.64 acres of Non-native Woodlands located in the southcentral portion of the Camp near existing facilities. The proposed project would impact 9.52 acres of Disturbed Habitat and 4.73 acres of Urban/Developed Lands. As Tier IV habitats, these impacts are not considered significant.

E. Rock Outcrops

The proposed education camp is expected to impact limited areas of rock outcrop and encroach upon more extensive outcroppings to the north. However, the proposed project would result in limited impacts to this habitat feature and would maintain extensive Rock Outcrops on the western portion of the project site. Therefore, impacts to rock outcrops would be less than significant.

2.2.3.2 Sensitive Plant Species

Direct impacts to Ramona Horkelia, Gander's Butterweed, and Felt-leaved Monardella would not result from implementation of the proposed project. Populations of these sensitive plants are located to the west of all proposed development. These species are adjacent to two well-established hiking trails that are typically surrounded by dense, uninviting vegetation. The trails show no indications of off-trail human intrusion, and improvements or other alterations are not proposed for these trails. To ensure protection of sensitive plant species, foot stakes (i.e., any permanent item that would not impact the area but would

discourage people from leaving the designated trail) and signs will be installed on either side of the trails (Figure 1-14). The signs will delineate the area beyond as an Environmentally Sensitive Area and prohibit access. These measures have been incorporated into the project design as Major Use Permit conditions (Section 1.1.1.2). Therefore, impacts to these populations would not be significant.

Ashy Spike-moss on-site is associated with the major rock outcrops which occur at higher site elevations within the proposed open space easement. Therefore, the project would not result in significant impacts to Ashy Spike-moss populations on-site. This species is no longer considered sensitive by CNPS but remains on the County's Sensitive Plant List as of September 2006.

Impact 2.2.h The proposed project would result in significant direct and indirect impacts to 38 Engelmann Oaks. Six of these Englemann Oaks would be impacted from development of the Retreat Center and access road.

At least 28 oaks would be directly impacted by the proposed construction, another two oaks lie adjacent to an existing road proposed for paving and fire clearing, and ten additional oaks lie within an existing development area slated for a conversion from cabins to staff housing and roadway paving. The majority of these impacted oaks are mapped as portions of Coast Live Oak Woodland, although one is mapped as part of Southern Coast Live Oak Riparian Forest, and three are mapped as individual trees in sage scrub, chaparral and scrub-chaparral.

2.2.3.3 Sensitive Wildlife Species

Direct impacts to the California Gnatcatcher are not expected based on the negative results of the 1999 focused surveys. No California Gnatcatchers were observed during general or focused surveys in 1999-2001 and CNDDB data (2006) does not indicate the presence of the species within the Camp site or immediate vicinity. There absence is likely due to elevation and limited habitat connectivity. The site is not outside of their range but represents sub-optimal habitat outside of a typical dispersal corridor.

Impact 2.2.i Increased noise levels associated with temporary project construction could result in significant indirect impacts to the California ~~Gnatchatcher~~Gnatcatcher.

The project does not propose any development within 4,000 feet of the Iron Mountain Golden Eagle nest site. Therefore, impacts to the Golden Eagle nest site would not be significant.

Although raptor nests were not identified within the project site, the Cooper's Hawk, Red-shouldered Hawk, and the Red-tailed Hawk have been observed within the project area.

Impact 2.2.j Increased noise levels associated with temporary project construction would result in significant indirect impacts to nesting raptors (Cooper's Hawk, Red-shouldered Hawk, and Red-tailed Hawk) within 300 feet of the construction footprint, if construction were to occur during their breeding season (February 15 through June 1).

2.2.3.4 Edge Effects

~~The f~~Fragmentation of wildlife habitat that will occur as a result of the proposed project will reduce the quality of existing habitats for large mammalian predators, birds of prey, and their prey species. Habitat fragmentation occurs when a native vegetation community is not entirely altered or developed, but what remains has a diminished wildlife habitat value. Fragmentation increases the amount of edge. Native flora may encounter increased competition from weedy species, which in turn affects the value of the habitat for wildlife. Edges between natural systems and human land uses can amplify these detrimental edge effects, and add others such as increased incidences of disease and pollution risks.

Increases in artificial light may occur from development-induced edges. The presence of artificial nighttime light has implications for a number of species, including the potential to artificially increase predation rates on vulnerable species. Areas particularly vulnerable to artificial lighting include wildlife corridors, high quality wildlife habitats, and deciduous trees. Street lighting is not proposed for this project and lighting is restricted to a minimum of 100 feet from the wildlife corridor, but lighting associated with recreational facilities, pedestrian pathways, and buildings is expected. As outlined in EIR Section 1.1.1.2A, lighting shall be low-pressure sodium with cut-off shields (fully shielded/full cutoff lighting). Such shields eliminate the horizontal and upward projection of light and direct the light downward, eliminating excess illumination. With implementation of the conditions outlined EIR Section 1.1.1.2A, potential lighting impacts associated with an increase in development edge would not be significant.

Increases in artificial noise levels may occur from development-induced edges. Noise levels below 60 dBA are not considered a significant impact by the resource agencies (Appendix B). The project noise study determined that on-site traffic noise would result in levels below 50 dBA Leq at the property lines and under 60 dBA Leq at sensitive habitats, such as sage scrub and riparian forest. Therefore, potential edge effects from noise would not be significant.

Oak woodlands may be particularly sensitive to edge effects resulting from irrigation, soil compaction, filling, and paving in and around oaks. The results of these effects may include reduction of oxygen to the root zone, proliferation of soil-borne diseases, and impeded passage of moisture and gases within the root zone. However, as outlined in EIR Section 1.1.1.2A, after trenching within the root zone the trees shall be carefully pruned to remove canopy material proportional to the roots damaged or lost. With implementation of the conditions outlined in EIR Section 1.1.1.2A potential edge effects on oak woodlands would not be significant.

The project's potential for edge effect impacts to sensitive flora are limited to the effects of human intrusion into populations of Felt-leaved Monardella and Gander's Butterweed. As outlined in EIR Section 1.1.1.2A, signage and foot stakes are required that would avoid detrimental edge effects on these sensitive floral species. With implementation of the conditions outlined in EIR Section 1.1.1.2A potential edge effects on the Felt-leaved Monardella and Gander's Butterweed would not be significant.

The introduction of invasive species into the Camp biological open space areas could have long-term, serious effects on wildlife habitat. Similarly, the spread of pre-existing invasive species could impact the suitability of on-site habitats for wildlife. However, as outlined in EIR Section 1.1.1.2A, landscaping within the

project area shall not include invasive exotic species. Therefore, potential edge effects from invasive plant species would not be significant.

2.2.3.5 Consistency with Applicable Habitat or Natural Community Plans

A. Multiple Species Conservation Program and Biological Mitigation Ordinance

The MSCP Subarea Plan Conformance Findings require that the project provide for the creation of significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats.

Impact 2.2.k Although the proposed project would conserve large blocks of habitat, the ratio of surface area to the perimeter of conserved habitats can be reduced by relocating the Retreat Center to the south as shown in Reduced Project Alternatives I and II. Therefore, the project does not comply with the MSCP requirement to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats.

Impact 2.2.l The BMO requires impacts to Biological Resource Core Areas to be avoided to the maximum extent practicable by using design criteria that include locating development in areas that minimize impacts to habitat. The project as proposed does not comply with this requirement. Construction of the Retreat Center access road would impact 0.~~04~~ 05 acre of ACOE Non-wetland Waters of the U.S. that are County-jurisdictional wetlands. This impact can be avoided by relocating the Retreat Center to the south as shown in Reduced Project Alternative I and II. Consequently, impact-with-mitigation is not allowed. The project as proposed fails to comply with the impact-avoidance design criteria in BMO, Article V, section A1, and the BMO findings necessary to approve the project cannot be made. This impact to wetlands is, therefore, significant and unmitigated.

Impact 2.2.m The BMO requires impacts to Biological Resource Core Areas to be avoided to the maximum extent practicable by using design criteria that include locating development in areas that minimize impacts to habitat. The project as proposed does not comply with this requirement. Construction of the Retreat Center and the access road would impact 0.94 acre of Diegan Coastal Sage Scrub and 1.08 acres of Coastal Sage-Chaparral Scrub. These impacts can be avoided by relocating the Retreat Center to the south as shown in Reduced Project Alternative I and II. Consequently, impact-with-mitigation is not allowed. The project as proposed fails to comply with the impact-avoidance design criteria in BMO, Article V, section A1, and the BMO findings necessary to approve the project cannot be made. The impacts to Diegan Coastal Sage Scrub and Coastal Sage-Chaparral Scrub are, therefore, significant and unmitigated.

Wildlife Corridors

As previously discussed, the MSCP Subarea Plan and BMO contain design criteria for linkages and corridors. Since the project site does not contain any linkages, the criteria numbered 1, 2, 4 and 5, which are intended to protect linkages dot not apply to the project. In addition, criteria number 11 addresses stepping-stone corridors and is not relevant to this project site; therefore, it does not apply to the project. Each remaining, applicable criterion is discussed with an evaluation of how it relates to the proposed project.

Criteria 3) Corridors with good vegetative and/or topographic cover will be protected.

The on-site corridor consists of riparian woodlands and upland habitats adjacent to the West Fork of San Vicente Creek. This local corridor had good vegetative and topographic cover preceding the Cedar Fire. The amount of vegetative cover within the corridor following the fire has substantially decreased, but in relation to the surrounding burned landscape it still has relatively good cover.

Under the proposed project, the corridor would not be protected in its entirety. The proposed Retreat Center access road would bisect the corridor in a single location. As outlined in EIR Section 1.1.1.2 A, the project includes several design features to minimize impacts to the local corridor. However, construction of the Retreat Center access road would result in a reduction in vegetative cover and a potential barrier to movement for some species within the corridor.

Criteria 6) If a corridor is relatively long, it must be wide enough for animals to hide in during the day. Generally, wide linkages are better than narrow ones. If narrow corridors are unavoidable, they should be relatively short. If the minimum width of a corridor is 400 feet, it should be no longer than 500 feet. A width of greater than 1,000 feet is recommended for large mammals and birds. Corridors for bobcats, deer, and other large animals should reach rim-to-rim along drainages, especially if the topography is steep.

The corridor associated with the West Fork of San Vicente varies in length as it passes through and off the site. Under existing conditions it's boundary may be defined by the Camp access road to the south and steep topography with increasing shrub density to the north. To the west, the corridor continues along the West Fork as the existing Camp access road turns southward and the corridor is then defined (and limited) solely by vegetative cover and topography. Aside from the Camp access road, all adjacent lands are currently vacant/open space.

The effective corridor width ranges from approximately 110 feet to over 200 within the property; however, aside from the direct access road there are no restrictions or alterations within the corridor and rim-to-rim corridor width exceeds 1,000 feet. The primary pinch point is where the corridor enters the site on the east, through a large box culvert under Mussey Grade Road. Downstream (southeast) of the site the corridor parallels Mussey Grade Road and maintains a width of approximately 100 feet, bound to the west by the road and to the east by residential development. On the western side of the site, the corridor effectively dissipates, as the vegetation is dominated by monotypic chaparral and the drainage becomes narrower and steeper, but no land use constraints exist. The total corridor length on-site is approximately 4,900 feet.

Under the proposed project the corridor would be impacted by a road crossing for the proposed Retreat Center. The proposed encroachment would include the removal of riparian forest and upland habitats within the footprint of an access road proposed to cross the West Fork of San Vicente Creek. Therefore, the proposed project would not meet the 1,000-foot guideline.

Criteria 7) Visual continuity (i.e., long lines-of-site) will be provided within movement corridors. This makes it more likely that animals will keep moving through it. Developments along the rim of a canyon used as a corridor should be set back from the canyon rim and screened to minimize their visual impact.

The on-site corridor is a typical local canyon corridor, which supports riparian vegetation on the eastern half of the site and upland chaparral dominated habitat on the west. The natural topography includes curves and visual continuity varies as habitats change through the corridor, but there are no existing gaps in native vegetation or human-induced visual impacts. Under the proposed project visual continuity would be interrupted by the proposed Retreat Center access road, which would bisect the corridor.

Criteria 8) Corridors with low levels of human disturbance, especially at night, will be selected. This includes maintaining low noise levels and limiting artificial lighting.

As previously discussed, the project would not increase noise or lighting within the riparian areas of the project site. However, traffic will increase on the Camp access road off Mussey Grade Road, increasing noise and automobile lighting within the corridor. This increase is expected to be minimal with regard to times when the corridor would receive the bulk of its use by wildlife (early morning and night).

Criteria 9) Barriers, such as roads, will be minimized. Roads that cross corridors should have ten foot high fencing that channels wildlife to underpasses located away from interchanges. The length-to-width ratio for wildlife underpasses is less than two, although this restriction can be relaxed for underpasses with a height of greater than 30 feet.

The proposed project includes one crossing (barrier) of the corridor, the retreat center access road. The roadway would incorporate an underpass composed of two 36-inch diameter box culverts. The Retreat Center access road has been designed to the narrowest width (24 feet) allowed by the County to minimize movement barriers and maximize the length to width ratio of the underpass. However, even with the combined width of the two box culverts, the length to width ratio is 4:1, which exceeds the criteria of less than 2:1 for underpasses less than 30 feet high.

Criteria 10) Where possible at wildlife crossings, road bridges for vehicular traffic rather than tunnels for wildlife use will be employed. Box culverts will only be used when they can achieve the wildlife crossing/movement goals for a specific location. Crossings will be designed as follows: sound insulation materials will be provided; the substrate will be left in a natural condition, and vegetated with native vegetation if possible; a line-of-site to the other end will be provided; and if necessary, low-level illumination will be installed in the tunnel.

This criterion establishes desired design standards for road crossings in areas with wildlife corridors. It includes the qualifier "where possible" which implies that it is not absolutely required; however, per the

DPLU staff, "every effort should be made to meet these standards". In the location of the Retreat Center access road a bridge is not feasible. The drainage here is low and the canyon is relatively open. Attempts to bridge the creek or corridor would result in increased corridor encroachment. Thus, box culverts have been included within the roadway design (EIR Section 1.1.1.2A). These culverts would permit movement of medium sized mammals. The culverts may permit movement of Coyotes and Bobcats, but these species are known to cross at grade even where underpasses exist. Under the proposed project, natural vegetation would persist surrounding the proposed crossing and the box culverts would permit a line of sight to the other end.

Impact 2.2.n As outlined above, the proposed project, specifically the location of the Retreat Center access road, fails to comply with applicable BMO design criteria for corridors, and this impact is significant and unmitigated. However, under the Reduced Project Alternative I and II, this impact is eliminated by relocating the Retreat Center to the south.

B. Resource Protection Ordinance

Sensitive Habitat Lands

Impact 2.2.o As previously stated, the portion of the site that would be impacted by the Retreat Center access road is considered a wildlife corridor, and thus, qualifies as a sensitive habitat land pursuant to RPO. Development of this road within sensitive habitat land is not allowed under the RPO, unless all feasible measures necessary to protect and preserve the sensitive habitat lands are required as a condition of permit approval and where mitigation provides an equal or greater benefit to the affected species. This impact can be avoided by relocating the Retreat Center to the south as shown in Reduced Project Alternatives I and II. The reduced alternatives present a biologically superior location for the Retreat Center, which does not require impacts to wetlands, wetland buffers, and sensitive habitat lands (wildlife corridor). Consequently, the proposed project is not consistent with RPO Section 86.603(a)~~Article III, Section 1~~.

Wetlands

There are several minor drainage features, most of which are heavily disturbed and unvegetated, within the central portion of the property. Many of these drainages are located within or very near existing campground development. As previously discussed, the project would result in 0.~~14~~17-acre impact to RPO-defined wetlands. Of the total 0.~~14~~17-acre of RPO-defined wetlands that the project would impact, impacts to 0.~~10~~ 12 acre would result from foot traffic associated with the recreational use of the site. It is important to note that even if the existing camp facilities were not expanded, the continued use of the site as a campground would result in continued impacts from recreational foot traffic to some of the minor drainages located throughout the project site. The RPO allows recreational uses in wetlands and wetland buffers if the use does not harm the natural ecosystem (RPO ~~Article IV,~~ Section 86.604~~s 1b and 2c~~). Foot traffic through the central Camp area is not expected to alter the natural ecosystem. The inter-facility paths on-site are located within Non-native Grassland habitat which is degraded due to existing human foot traffic and mowing. Continued and increased use of these paths would not significantly alter the

existing habitat nor would it affect resident or transient wildlife. Where drainages cross the central Camp area between facilities, these drainages are, for the most part, swale-like and support non-wetland associated plants. Table 4 provided in the biological technical report (EIR Appendix B) identifies the buffer widths for on-site wetlands.

Although the proposed access road has been designed to be the narrowest allowed by the County and Ramona Fire Department, the access road would impact approximately 0.~~04~~ 05 acre of RPO-defined wetlands. Impacts to wetlands would be minimized and offset by removal and revegetation of the existing wetland crossing. However, the RPO does not allow a road within wetlands.

Impact 2.2.p The Retreat Center access road would impact 0.~~04~~ 05 acre of RPO wetlands. Therefore, the project as proposed fails to comply with RPO, Section IV 1, and this impact is significant and unmitigated. However, under the Reduced Project Alternative I and II, this impact is eliminated by relocating the Retreat Center to the south.

2.2.4 Mitigation Measures

The following mitigation measures will reduce the impacts to below a level of significance.

2.2.4.1 Vegetation Communities

A. Tier I Habitats

1. Coast Live Oak Woodlands and Southern Coast Live Oak Riparian Forest

The proposed project would impact 7.29 acres of Coast Live Oak Woodlands and two acres of Southern Coast Live Oak Riparian Forest. The BMO, requires a 2:1 mitigation ratio ~~if~~ as the mitigation site (on-site open space) meets the criteria for a BRCA. ~~Existing on-site oak woodlands meet the BMO BRCA criteria.~~ Based on the total oak woodland impacts for the proposed project, 18.58 acres of oak woodlands (Tier 1 habitats) would be required to mitigate impacts to a level below significance (Tables 2.2-1 and 2.2-2).

MM 2.2.a & b Within the proposed dedicated open space easement, 18.89 acres of oak woodland (15.05 acres Southern Coast Live Oak Riparian Forest, and 3.84 acres Coast Live Oak Woodland) shall be preserved.

2. Non-Wetland Waters of the U.S.

The proposed project would impact 0.~~14~~ 17 acre of Non-Wetland Water of the U.S. The BMO, requires a 2:1 mitigation ratio (Table 2.2-1). Creation would occur in the proposed dedicated open space easement in the northern portion of the project site within Non-Native Grassland habitat adjacent to riparian areas associated with the West Fork of San Vicente Creek (Figures 2.2-1 through 2.2-11~~2.2-2~~). A conceptual wetland restoration plan has been submitted to the County. The plan includes specifications, planting plans, maintenance and monitoring actions, and success criteria. County approval of the conceptual wetland restoration plan is required prior to approval of the Major Use Permit associated with the proposed project.

MM 2.2.c Within the proposed dedicated open space easement in the northern portion of the site within the Non-Native Grassland habitat adjacent to riparian areas associated with the West Fork of the San Vicente Creek, 0.~~36~~ 39 acre of wetland habitat shall be created in accordance with a wetland restoration plan approved by the County.

B. Tier II Habitats

1. Diegan Coastal Sage Scrub and Coastal Sage-Chaparral Scrub

The proposed project would impact 13.12 acres of Diegan Coastal Sage Scrub and 9.26 acres of Coastal Sage-Chaparral Scrub. The BMO~~,~~ requires a 1.5:1 mitigation ratio for impacts to these vegetation communities. As such, preservation of 33.57 acres of on-site sage scrub would reduce this impact to below a level of significance.

MM 2.2.d & e Within the proposed dedicated open space easement 35.~~54~~ 36 acres of sage scrub (6.46 acres of Mafic Southern Mixed Chaparral [a Tier I habitat], 0.~~01~~ 05 acre of Diegan Coastal Sage Scrub, and ~~29.07~~28.85 acres of Coastal Sage-Chaparral Scrub) shall be preserved.

Although other areas of Diegan Coastal Sage Scrub or Coastal Sage-Chaparral Scrub could be added to the proposed open space in lieu of up-tiering to use Mafic Southern Mixed Chaparral, the areas are not preferable due to their location adjacent to proposed development, isolation through existing disturbance, and/or disjunct location relative to the proposed open space easement. The Mafic Southern Mixed Chaparral is expected to have similar biological values and functions to Coastal Sage-Chaparral Scrub and would generally be used by the same suite of species.

C. Tier III Habitats

1. Southern Mixed Chaparral

The proposed project would impact 37.36 acres of Southern Mixed Chaparral. The BMO, requires a 1:1 mitigation ratio for impacts to Southern Mixed Chaparral. As such, preservation of 37.36 acres of Southern Mixed Chaparral would reduce this impact to below a level of significance.

2. Non-native Grasslands

The proposed project would impact 12.~~33~~ 45 acres of Non-native Grasslands. The BMO, requires a 0.5:1 mitigation ratio for impacts to Non-native Grassland. As such, preservation of ~~6.17~~6.32 acre~~s~~ of Non-native Grassland would reduce this impact to below a level of significance.

MM 2.2.f & g Within the proposed dedicated open space easement, ~~53.61~~223.42 acres of Tier III habitat (~~53.25~~223.19 acres of Southern Mixed Chaparral and 0.~~36~~ 23 acre of Non-native Grassland) shall be preserved.

By preserving ~~53.61~~223.42 acres of Tier III habitat comprised of ~~53.25~~223.19 acres of Southern Mixed Chaparral and 0.36 acres of Non-native Grassland in the open space easement, impacts to Tier III habitats would be reduced to less than significant.

2.2.4.2 Sensitive Plant Species

The proposed project would impact 38 Englemann Oaks, nearly all of which are located within the larger Coast Live Oak habitat.

MM 2.2.h Engelmann Oaks (Group D) shall be preserved through on-site preservation of oak woodlands in the proposed dedicated open space easement.

This mitigation approach complies with the BMO's direction that impacts to Engelmann Oak species in Groups C and D be protected using habitat-based mitigation. With on-site preservation of Engelmann Oaks in accordance with the BMO, impacts to this species would be reduced to below a level of significance.

2.2.4.3 Sensitive Wildlife Species

MM 2.2.i Construction activities shall be prohibited during the California gnatcatcher breeding season (March 1 - July 1) unless nest monitoring is conducted by a qualified biologist and results indicated the absence of active nests or the completion of the breeding season.

MM 2.2.j Prior to construction within 300 feet of potential raptor nesting habitat (i.e., riparian or woodland habitat) to be conducted during the raptor breeding season (February 15 through June 1), the area within 300 feet of the construction footprint shall be surveyed for the presence of nesting raptors. If active nests are present, construction within 300 feet of the active nest will be delayed until the ~~conclusion of the breeding season~~nest is abandoned.

2.2.5 Conclusions

With implementation of the proposed biological mitigation measures, the project would not substantially affect an endangered, rare, or threatened species or the habitat of such a species; interfere substantially with the movement of any resident or migratory fish or wildlife species; nor substantially diminish habitat for fish, wildlife or plants. All physical project-related impacts to biological resources can be mitigated to below a level of significance by achieving the necessary habitat based mitigation by preservation in an open space easement on-site. However, as explained above, the BMO does not allow impact-with-mitigation if development can be located to "minimize" impacts to habitat. The proposed location of the Retreat Center and associated access road conflict with the BMO because the Retreat Center can be relocated to the south to avoid impacts to habitat. Likewise, the RPO does not allow impact-with-mitigation, but strictly limits uses allowed in wetlands. Although minor impacts due to foot traffic are allowed under the RPO, the road for the proposed Retreat Center conflicts with the RPO because RPO does not allow a road in a wetland. The conflict with the RPO can be avoided by relocating the Retreat Center to the south. Because of these conflicts with the BMO and RPO, impacts to biological resources are significant and unmitigated. These impacts are eliminated under the Reduced Project Alternatives that relocate the Retreat Center to the south.

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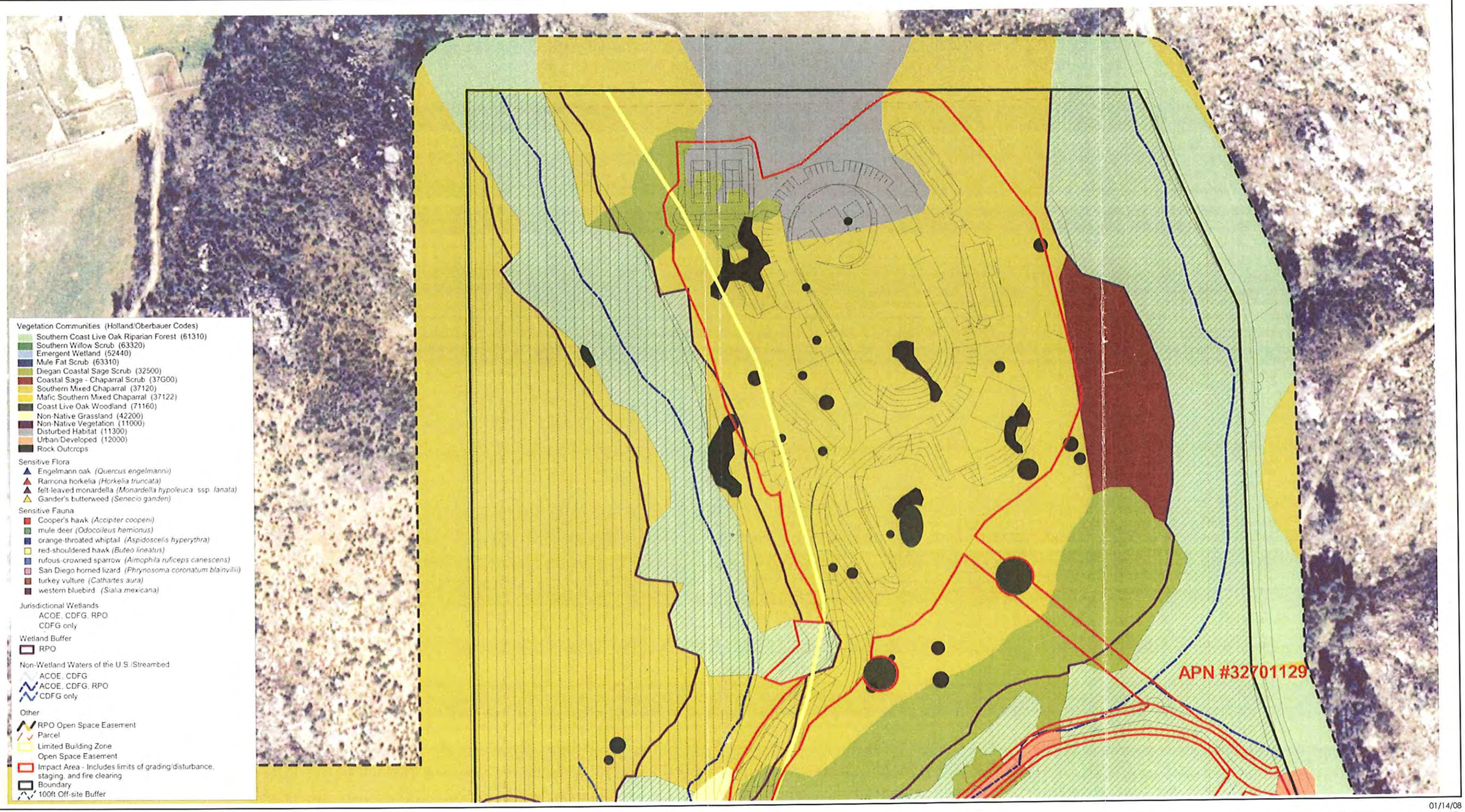

01/14/08

Source : Merkell and Assoc, 2006

BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Proposed Project

FIGURE 2.2-1

Source : Merkell and Assoc, 2006

01/14/08

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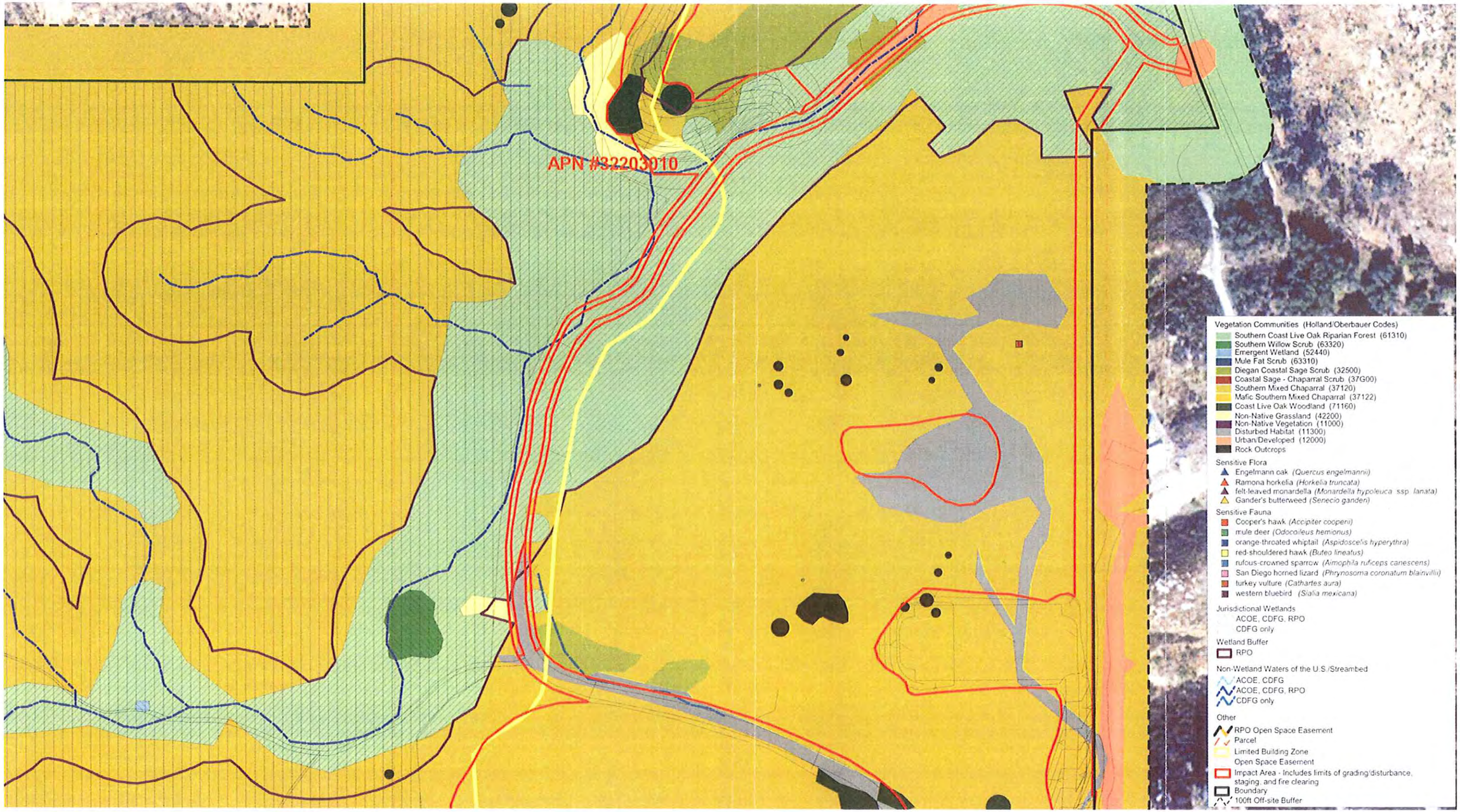
Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Proposed Project

FIGURE 2.2-2



Source : Merkell and Assoc, 2006

01/14/08

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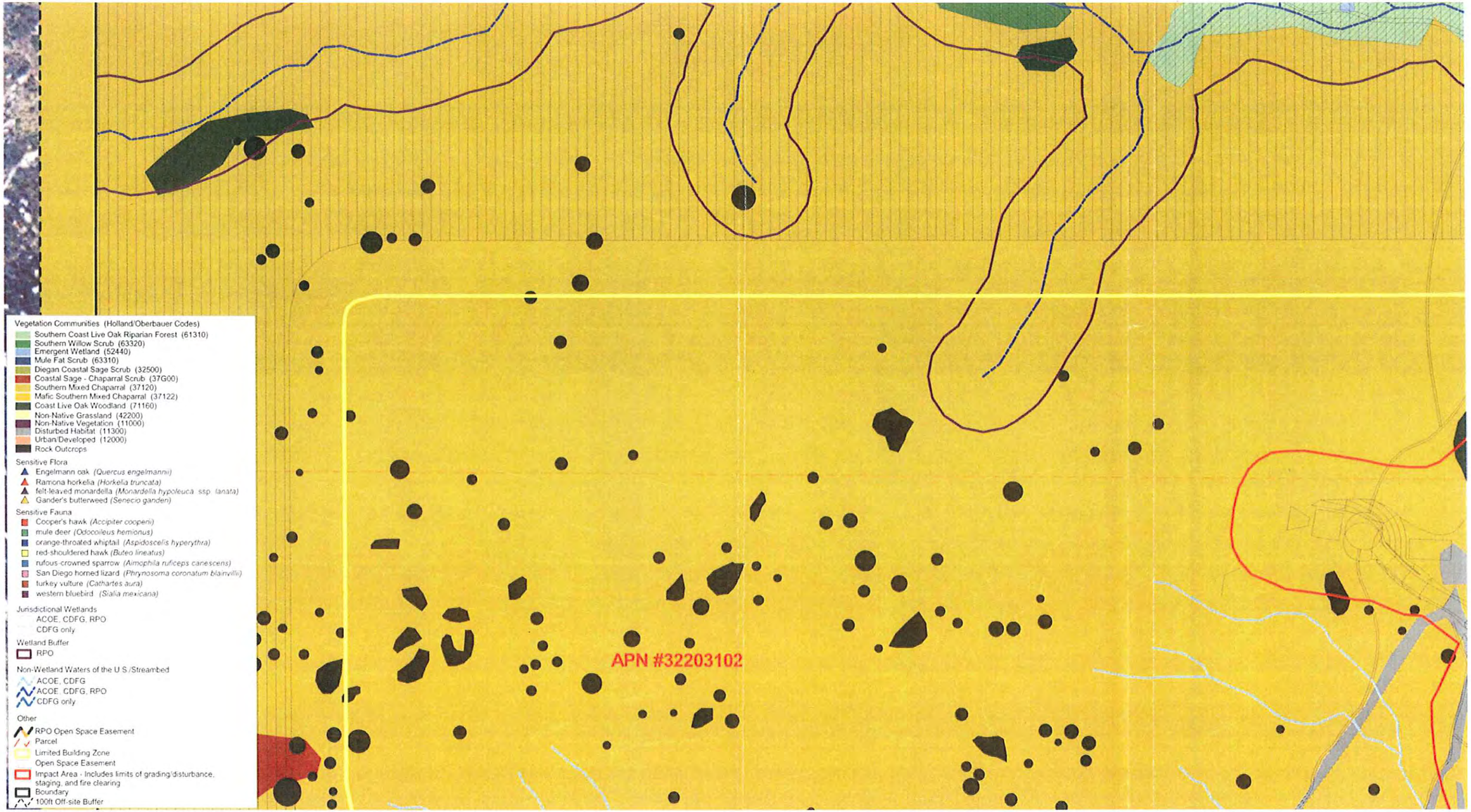
Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Proposed Project

FIGURE 2.2-3



Source : Merkell and Assoc, 2006

01/14/08

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Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Proposed Project

FIGURE 2.2-4

Source : Merkell and Assoc, 2006

01/14/08

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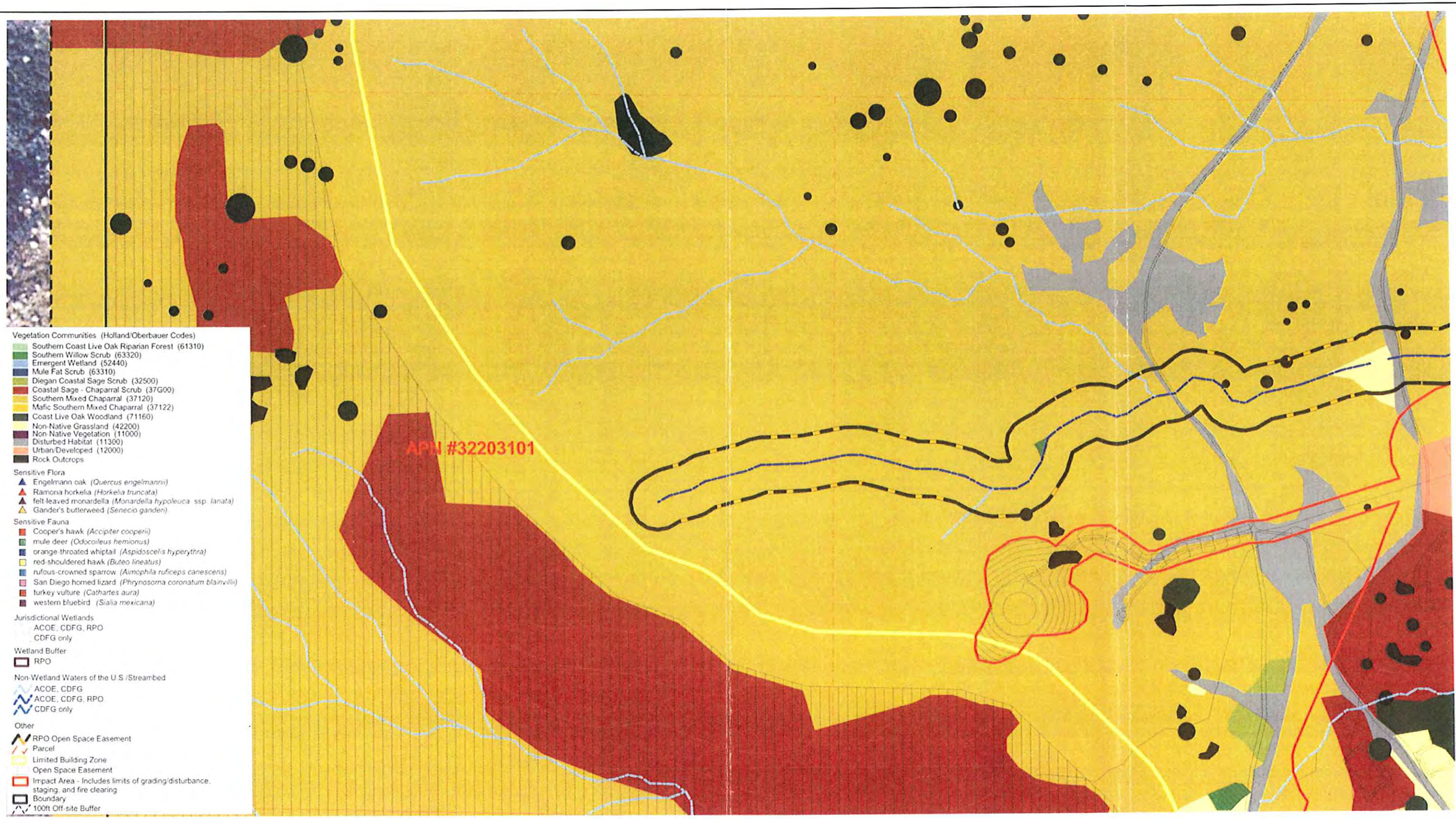
Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Proposed Project

FIGURE 2.2-5



01/14/08

Source : Merkell and Assoc, 2006

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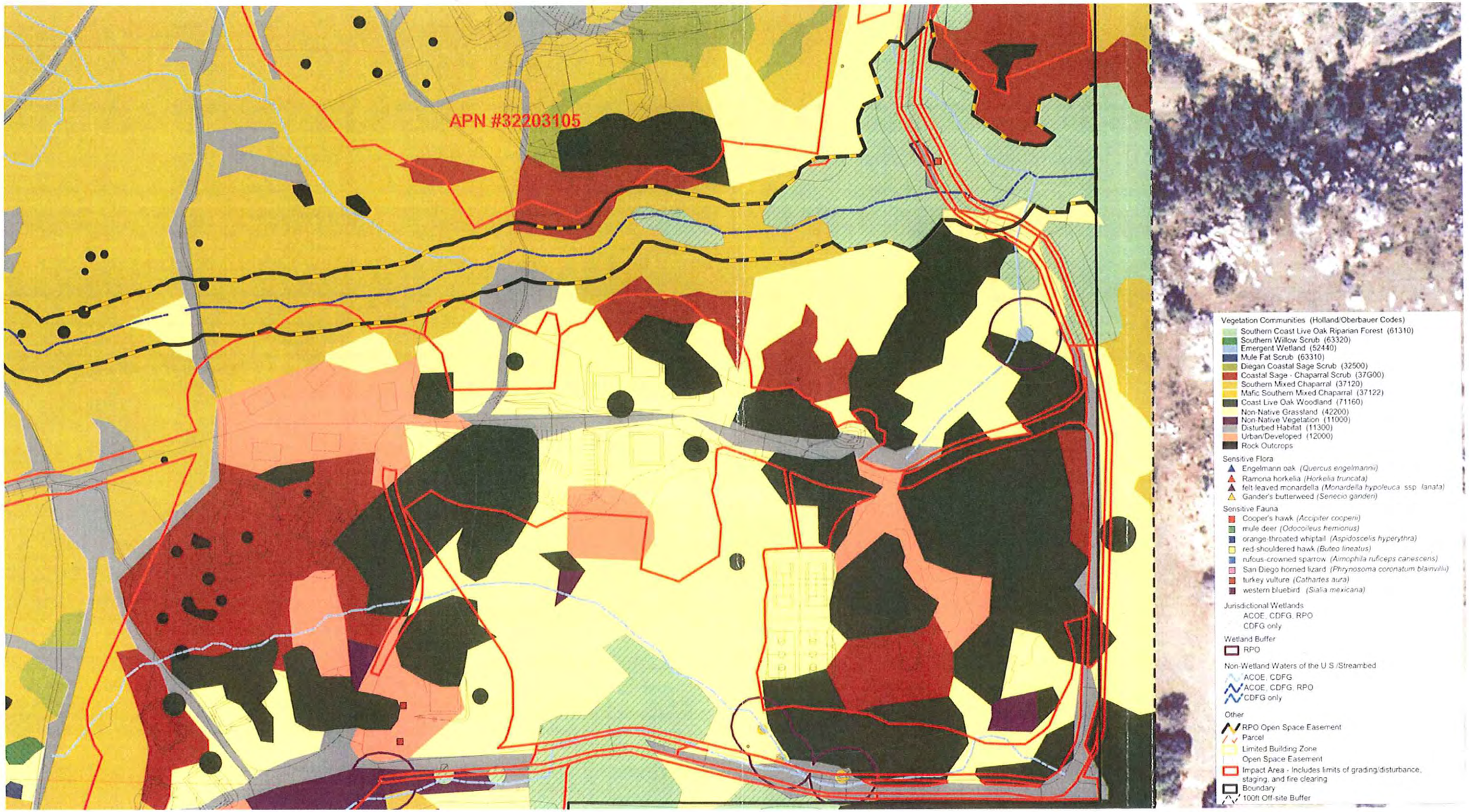
Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Proposed Project

FIGURE 2.2-6



Source : Merkell and Assoc, 2006

01/14/08

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Biological Resouce Map - Proposed Project

FIGURE 2.2-7

Source : Merkell and Assoc, 2006

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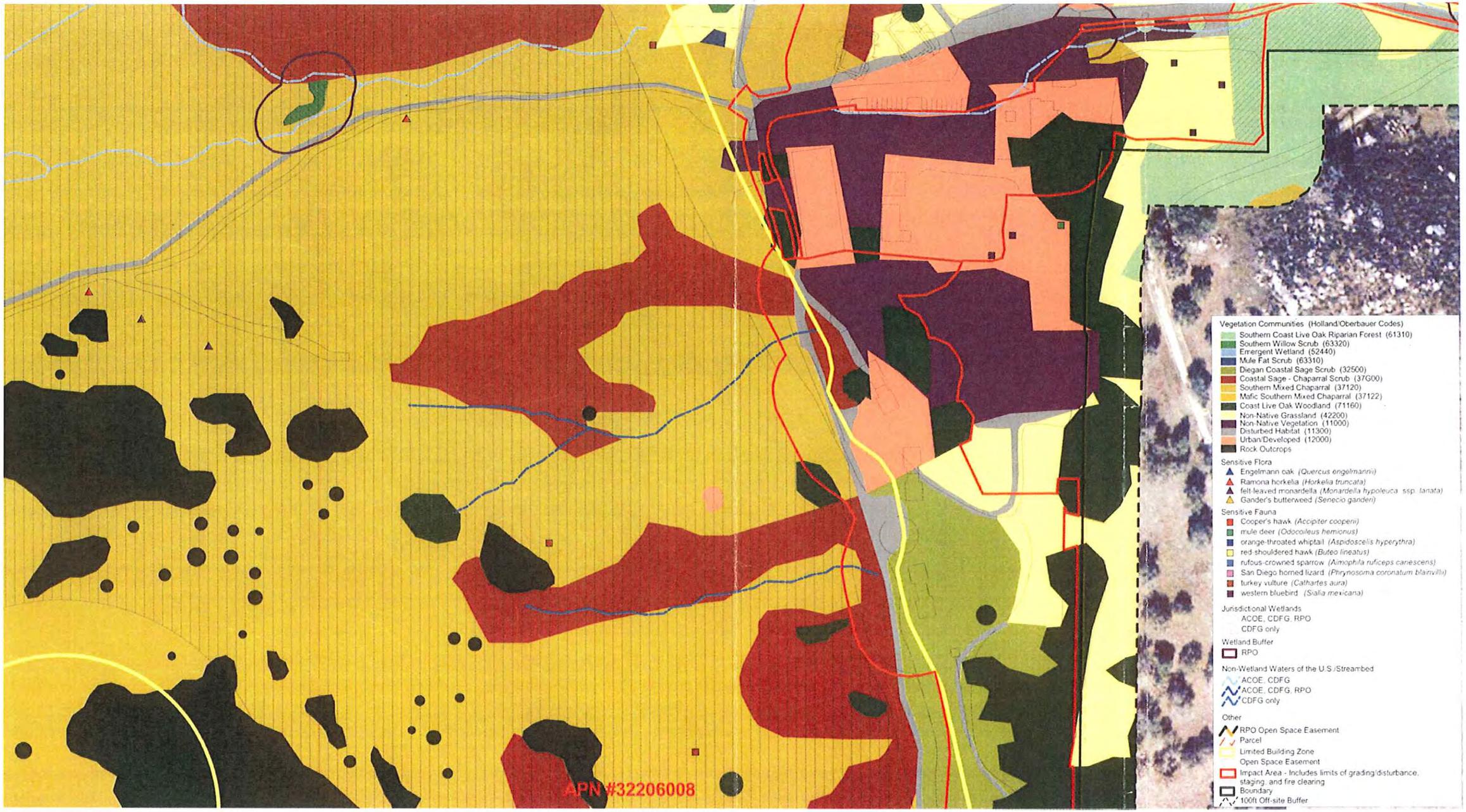
Biological Resouce Map - Proposed Project

FIGURE 2.2-8



Source : Merkell and Assoc, 2006

01/14/08

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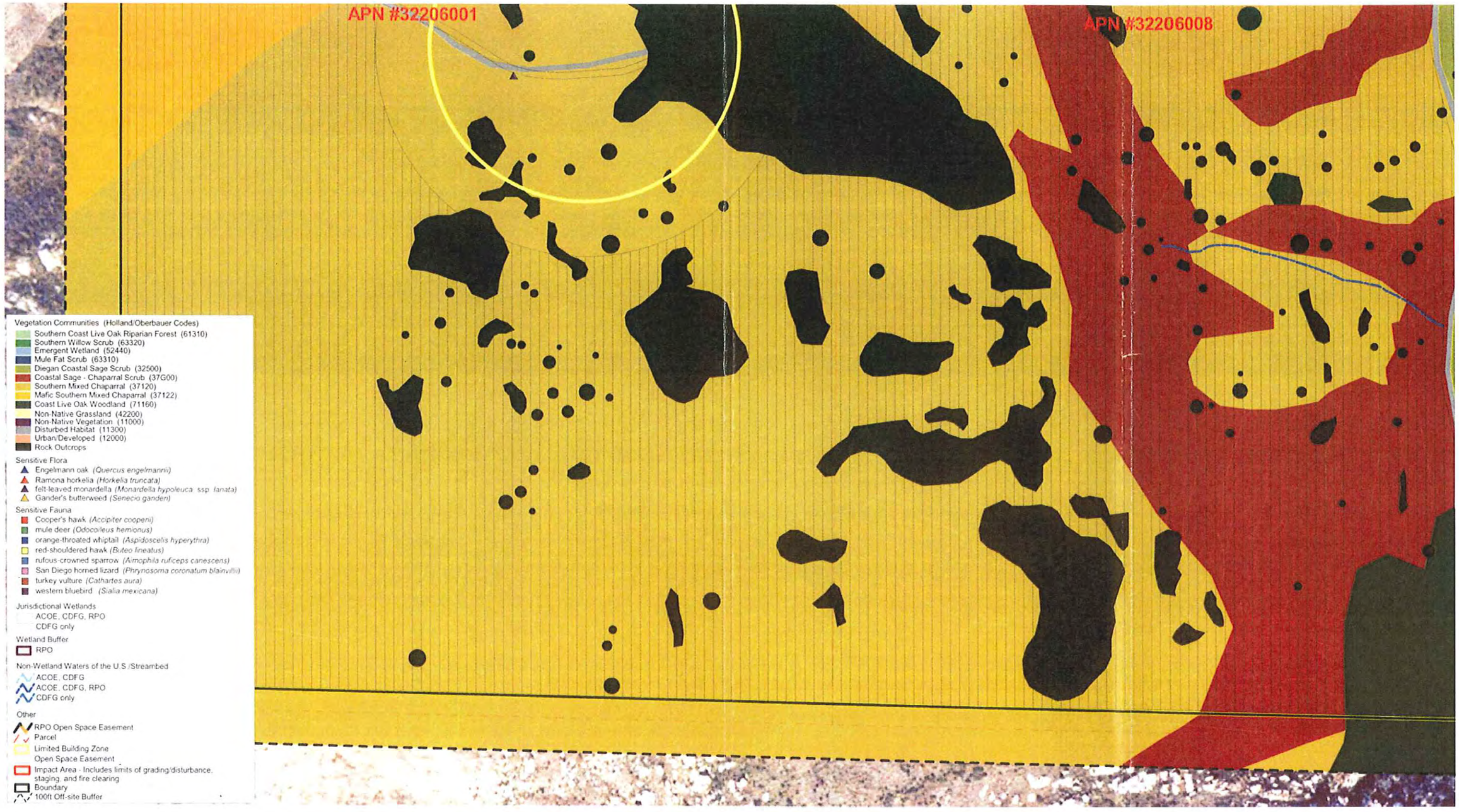
Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Proposed Project

FIGURE 2.2-9



Source : Merkell and Assoc, 2006

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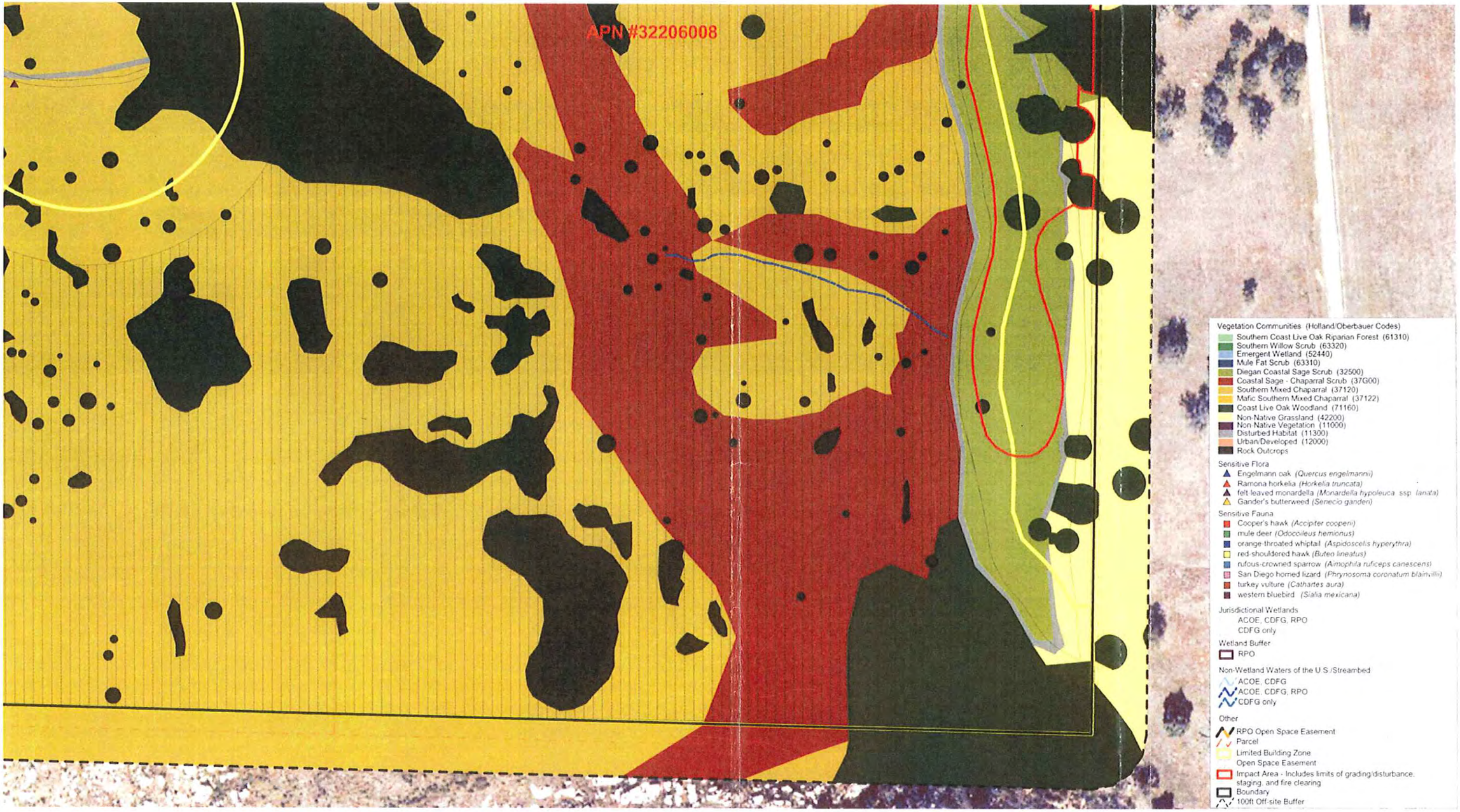
Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Proposed Project

FIGURE 2.2-10



Source : Merkell and Assoc, 2006

01/14/08

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Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Proposed Project

FIGURE 2.2-11

TABLE 2.2-1
Vegetation Communities and Wetlands Impacts and Required Mitigation

Vegetation Community	Impacted Area	Required Mitigation
Non-native Woodland	1.64	0.00
Disturbed	9.52	0.00
Urban/Developed	4.73	0.00
Diegan Coastal Sage Scrub	13.12	19.68
Coastal Sage-Chaparral Scrub	9.26	13.89
Southern Mixed Chaparral	37.36	37.36
Non-native Grasslands	12.~~33~~[1]45[1]	6.~~17~~[1]23[1]
Southern Coast Live Oak Riparian Forest	2.00	4.00[2]
Coast Live Oak Woodland	7.29	14.58[2]
Non-Wetland Waters ACOE/Streambed (CDFG)/ County Jurisdictional Wetlands - 2:1 Mitigation Requirement	0.~~14~~17/0.~~18~~23/ 0.1417	0.~~28~~34/0.~~36~~46/ 0.~~28~~34
County Jurisdictional Wetlands - 3:1 Mitigation Requirement[3]	0.05	0.15
TOTAL	97.~~44~~47/97.~~48~~53/ 97.~~44~~47	96.~~11~~17/96.~~03~~13/ 96.~~11~~17

Notes: [1] Includes impacts and mitigation from wetland creation site.
[2] Includes impacts and mitigation for oak impacts within 25 foot buffer.
[3] Existing acreage includes 0.03 acre Emergent Wetland, 0.02 acre Mule Fat Scrub, 0.73 acre Southern Willow Scrub, and 1.46 acres of Southern Coast Live Oak Riparian Woodland. Impacted acreage includes 0.05 acre Southern Coast Live Oak Riparian Forest.
Source: Merkel & Associates, 2003.

Table 2.2-2
BMO Required Mitigation and Open Space Constituents

Habitat Tier	Vegetation Community	Impact	Required Mitigation	Open Space Easement
I	Southern Willow Scrub	0.00	0.00	0.67
I	Emergent Wetland	0.00	0.00	0.01
I	Southern Coast Live Oak Riparian Forest	2.00	4.00[2]	~~15.05~~14.59
I	Coast Live Oak Woodland	7.29	14.58[2]	~~3.84~~4.0
	Oak Woodlands Subtotal	9.29	18.58	~~18.89~~19.27
I	Mafic Southern Mixed Chaparral	0.00	0.00	6.46
II	Diegan Coastal Sage Scrub	13.12	19.68	0.~~01~~05
II	Coastal Sage-Chaparral Scrub	9.26	13.89	~~29.07~~28.85
	Scrub & Tier I Chaparral Subtotal	22.38	33.57	35.~~54~~36
III	Southern Mixed Chaparral	37.36	37.36	~~53.25~~223.19
III	Non-native Grasslands	12.~~33[1]~~45[1]	6.17[1]	~~0.36~~0.23
	Tier III Habitats Subtotal	49.~~69~~81	43.53	~~53.61~~223.42
IV	Disturbed	9.52	0.00	~~0.25~~0.72
IV	Urban/Developed	4.73	0.00	0.03
	Tier IV Habitats Subtotal	14.25	0.00	~~0.28~~0.75
TOTAL		95.~~61~~73	95.68	~~109.00~~278.80

Notes: [1] Includes impacts and mitigation from wetland creation site.
[2] Includes impacts and mitigation for oak impacts within 25 foot buffer.
Source: Merkel & Associates, 2003.

2.3 Hazards and Hazardous Materials

Section 2.3 Hazards and Hazardous Materials has been revised to incorporate information from the Fire Protection Plan (FPP) that has been prepared for the Salvation Army Divisional Camp and Retreat (based on the site layout for Alternative I). Mitigation Measure 2.3.b of the DEIR included required content for the future FPP. The measures required by Mitigation Measure 2.3.b were incorporated into the FPP. Mitigation Measure 2.3.b, has been amended to require that the recommendations and measures identified in the FPP be implemented at the project site.

Section 2.3, Hazards and Hazardous Materials has also been revised to include a detailed analysis of the infeasibility of providing a secondary emergency access to/from the project site via SR-67, and also includes an analysis of the potential impacts to Mussey Grade Road under an emergency evacuation scenario.

This discussion includes information provided in the Salvation Army Divisional Camp Fire Protection Plan prepared by Dudek (Dudek, 2008 [EIR Appendix J]).

2.3.1 Existing Conditions

The Ramona Planning Area, where the project site is located, experiences significant fire hazards due to its location within heavily vegetated foothills within a relatively dry climate, especially during summer months. The Salvation Army Divisional Camp property is located in a rural setting and is largely covered with highly flammable native and non-native vegetation. ~~The fire hazard rating for the property is high. A wildfire occurred on the property in 1995 and more recently in October 2003.~~ The project site lies within an area designated as having a very high fire hazard potential by the California Department of Forestry (Cal Fire) (2007 Proposed Fire Severity Mapping) and is located within the jurisdiction of the Ramona Fire Department, which contracts with Cal Fire.

The topography of the site consists of steep slopes in the western portions of the property that transition into rolling hills and flatter pasture-like areas, which are occasionally bisected by intermittent and ephemeral drainages. The northern and western portions of the property contain steeper and more rugged terrain with slopes ranging from 30% to 45%. The central and eastern portions of the property, where most of the buildings associated with the camp expansion are proposed, is characterized by much flatter terrain with slopes averaging approximately 10%. A majority of the vegetation on-site is mixed chaparral, comprising approximately 71% of the property. This vegetation community is located primarily on steep slopes in the northern and western areas of the site. The vegetation adjacent to a large portion of the proposed camp improvements consists of oak savannah with grass understory and riparian oak communities. Also, coastal sage scrub communities combine to represent nearly 11% of the property, located on the steeper slopes of the property. A little over 14% of the property is characterized by grasses, including those areas classified as oak and non-native woodlands, as the understory is commonly limited to non-native grasses. The remaining vegetation occurs in lower amounts.

The climate in the project area is typified by warm, dry summers and wetter winters. Precipitation typically occurs between December and March. The prevailing wind is an onshore flow with fall winds

(Santa Ana Winds) from the northeast that may gust to 50 miles per hour or higher. The project area's climate has a large influence on the fire risk as drying vegetation during the summer months becomes fuel available to advancing flames should an ignition occur. Extreme conditions, assumed for fire behavior modeling for the project site, include 95 degree temperatures in the summer and wind gusts of 50 miles per hour during the fall. Relative humidity of less than 10% is possible during fire season.

Fire history is an important component of fire protection planning. Fire history information can provide an understanding of fire frequency, fire type, most vulnerable project areas, and significant ignition sources, amongst others. Appendix C – Fire History Exhibit, provided in Appendix J (Fire Protection Plan) of this Revised Draft EIR, presents a fire history exhibit for the Salvation Army Divisional Camp site and project vicinity. There have been several fires recorded by fire agencies both on and in the vicinity of the project site. Fire history data was obtained via the California Department of Forestry and Fire Protection (CDF) Fire and Resource Assessment Program (FRAP)[1] database. The most recent fire, the Witch Creek Fire, occurred in the Ramona area in October 2007. This fire burned well north and east of the project site, and did not reach the Mussey Grade area. The most recent fire that burned across the site and damaged several older structures onsite (built prior to code updates intended to reduce risk of ignition) was the Cedar Fire in 2003. Prior to the Cedar Fire, the 1995 Poway Fire burned the southwestern portion of the property, the 1972 Klondike Fire burned the northern portion of the property, the 1958 Pearson Peak Fire burned the northwestern portion of the property, and an unnamed fire in 1913 burned the entirety of the property. Based on a review of this information, fire return intervals from the documented 1913 fire to the 2003 Cedar Fire have generally become shorter over time, with 45, 14, 23, and 8 years separating documented fire events onsite, respectively, but with an average fire frequency of approximately every 30 years.

Information on the services and existing conditions of the Ramona Fire Department is further described in ~~the~~ Section 6.2, Public Services, of this EIR. The Salvation Army Divisional Camp is located within the jurisdiction of the Operational Area Emergency Plan (OAEP) established by the County Office of Disaster Preparedness. The San Diego County Operational Area Emergency Plan describes a comprehensive emergency management system which provides for a planned response to disaster situations associated with natural disasters, technological incidents, and nuclear-related incidents. The OAEP defines responsibilities, establishes lines of communications, and is designed to be part of the Statewide Standardized Emergency Management System.

The Salvation Army Divisional Camp is accredited by the American Camping Association (ACA). As an accredited ACA camp[2] for the past five years, the Salvation Army Divisional Camp adheres to all mandatory standards of the ACA. ACA standards are divided into categories and ranges of applicability such as site and food service and transportation and operational management. The operational management category, which is applicable to all types of ACA camps, requires that each camp establish written emergency procedures that are specific to the site, staffing, type of camp operation and clientele. Procedures normally include what to do in case of storms, earthquakes, fires, or power

[1] California Department of Forestry and Fire Protection; Fire and Resource Assessment Program; (http://frap.cdf.ca.gov)

[2] The camp was most recently accredited in 2005, with the accreditation valid through 2008.

outages, as well as site or building evacuation procedures. These written materials can be found posted within buildings throughout the camp.

The Salvation Army Divisional Camp has an existing internal Emergency Evacuation Plan, known as the Disaster Plan, in place that has been reviewed and approved by the ~~Ramona~~ Sheriff's Department. This Disaster Plan gives general instructions to be followed during evacuation and would be used throughout the development and operation of the project, including, 1) continuous honking of horns to alert campers and staff; 2) assembling on existing play fields; 3) counselors will stand with campers and verify that all assigned campers are accounted for; 4) designated staff members will look for any missing campers; and, 5) wait for further instructions from emergency personnel. ~~There are three access roads on-site that lead to Mussey Grade Road and can be used during an emergency evacuation, they are 1) the main access road; 2) access through Wildwood Ranch on the eastern boundary of the project site; and, 3) access through a small residential parcel owned by the Salvation Army, (not a part of the project) located behind existing staff housing, on the eastern boundary of the project site.~~There is one primary point of access with one additional ingress route available to the fire department.

The effectiveness of the Salvation Army's Disaster Plan was demonstrated during the October 2003 fire disaster. Two groups, including approximately 100 campers, were on the project site when the fire struck the property (pers. comm., D. Patton, November 2003). The Salvation Army had begun their procedures to self evacuate the site when the Sheriff arrived at 7:20 a.m. on October 26th to request the camp be evacuated. The Salvation Army's Disaster Plan procedures were followed and no injuries or loss of life occurred. However, several structures were burned including three staff residences, one activity building, two camp cabins, one infirmary, one maintenance shed along with vehicles and equipment, and one tent/platform. The Witch Creek Fire began on Sunday, October 21, 2007. That weekend, there were approximately 85 campers at the camp. However, these campers left the camp in late morning/early afternoon, well before the mandatory evacuation of the community of Ramona was issued. Approximately nine camp staff personnel evacuated later that evening, all without incident.

Since the October 2003 fire disaster, the Salvation Army has updated the Disaster Plan to include additional emergency procedures. The updated emergency procedures are included ~~as EIR Appendix I~~in the Fire Protection Plan (Appendix J). The updated emergency procedures include details for site evacuation. These procedures ~~have been~~were reviewed by Ramona Municipal Water District (RMWD) Fire Marshall Steve Delgadillo and Chief Vogt. A letter from the fire Marshall with approval of emergency procedures is included in Appendix I. Additionally, a Fire Protection Plan (FPP) has been prepared for the camp (discussed in Section 2.3.3.1). The FPP was reviewed, and accepted by the County of San Diego Fire Services Coordinator and by the Ramona Municipal Water District Fire Marshall in November 2007.

2.3.1.1 Current Fire Protection Status

The status of fire protection features at the camp prior to the 2003 Cedar wildfire, which burned the site causing the loss of several structures, was very different from the current status onsite. Since the 2003 Cedar Fire, the Salvation Army has implemented fuel modification (brush clearance) and has replaced burned buildings, with new, ignition-resistant construction.

2.3.1.2 Existing Water Supply and Fire Flow

The following comprises the existing water infrastructure available at or near the site:

- A 10,000-gallon water tank is situated north of the existing administrative building at an elevation 100 feet higher than the remainder of the Camp.
- Fire flow – gravity fed, pressure varies by Camp location.
- A 30,000-gallon swimming pool is located adjacent to the recreational field.
- San Vicente reservoir is located 3.6 miles south of the Camp.
- An approximately 3-acre pond is located adjacent to the property's southern boundary on an off-site parcel.
- An approximately 2-acre pond in Dos Picos Park is located 1.4 miles north of the existing administrative building.

2.3.1.3 Existing Fire Access

The project site is accessed off Mussey Grade Road via an existing driveway road that includes intermittent paving and packed decomposed granite surface. From Mussey Grade Road, the site's primary access road passes through an existing gate and traverses 1.3 miles to the existing parking lot area. The road has been placed to take advantage of the terrain, following a natural drainage bottom area around steeper hillsides on either side until it enters a flatter meadow area approximately 0.5 linear mile from Mussey Grade Road. The road takes a sharp turn to the west before it terminates at a large paved parking area.

2.3.1.4 Existing Building Fire and Ignition Resistance

The 28 structures currently existing at the camp were constructed with varying degrees of ignition resistance. Newer structures, constructed after the 2003 Cedar wildfires, are built in accordance with codes which require ignition-resistant construction. Maintenance facilities on-site are metal sided and fire proof. Older structures do contain some features consistent with ignition-resistant construction, but also include wood siding, unboxed eaves, and other potentially vulnerable features.

2.3.1.5 Existing Fire Protection Systems

The following are the existing fire protection systems at the camp:

- Approximately one-half (14) of the 28 existing structures include interior fire sprinklers.
- Three fire hoses and outlet attachments are located throughout the camp's developed areas – fed by gravity from the camp's 10,000-gallon water tank.
- Smoking is prohibited onsite.

2.3.1.6 Existing Defensible Space/Vegetation Management

Defensible space at the camp site consists of the following:

- Primary-access-road shoulder is mowed to the extent possible, including up to 100 feet in open meadow areas.
- Property perimeter is mowed, especially along north/south circulation road.
- Large grass fields are tilled along perimeters and on their interior to break up light, flashy fuel continuity.

The Salvation Army Divisional Camp currently uses propane gas stored in tanks for heating and cooking purposes within the property. There are approximately seven to ten propane tanks located throughout the site. Additionally, there are two above-ground storage tanks storing diesel and gasoline for maintenance vehicles in the existing maintenance yard. Two additional 55-gallon drums are on-site which store waste oil and used oil filters for proper disposal and recycling. Based on a records search of the County of San Diego Hazardous Materials Establishment Listing Search (County of San Diego Listing: Establishment Number H35642, February 2002), the tank storing gasoline has the capacity of 550 gallons, while the tank storing diesel fuel has a capacity of 280 gallons. The existing gasoline and diesel tanks were upgraded in 1998, as directed by a County of San Diego health inspector, by constructing a concrete well underneath the tanks to prevent soil contamination in the case of a spill or leak (pers. comm. Patton, D., April 2000). No recorded violations were found on the County of San Diego Listing as of February 2002. The San Diego County Department of Environmental Health requires the preparation of a Business Plan for any business which uses, handles, or stores more than 55 gallons of a hazardous substance. Business Plans contain basic information about the location, type, quantity and health risks of the hazardous materials stored, used or disposed of by a business. The Salvation Army currently has a Business Plan for the two above-ground storage tanks.

2.3.2 Thresholds of Significance

In accordance with CEQA Appendix G and the County of San Diego Operational Area Emergency Plan, the project would result in a significant Hazards and Hazardous Materials impacts if it:

- Results in a significant risk of accidental explosion or release of hazardous substances (State of California, 2002).
- Results in or has the potential to interfere with the County of San Diego Operational Area Emergency Plan or the County of San Diego Operational Site Specific Dam Failure Evacuation Data Plans.
- Increases the potential for fire in areas with flammable vegetation or exposes people or the property to fire hazards, flooding or any other significant health or safety hazard (State of California, 2002).

These criteria are applicable for this analysis as they are based on approved federal and local laws such as the Federal Resource Conservation and Recovery Act, Executive Order 11988 (floodplains), the County of San Diego's Operational Area Emergency Plan, and the San Diego Operational Site Specific Dam Failure Evacuation Data Plans, which are designed to preclude Hazard and Hazardous Materials impacts.

2.3.3 Analysis of Project Effects and Determination as to Significance

Impact 2.3.a The existing above-ground fuel storage tanks are proposed to be relocated along with the maintenance facility to the central-eastern boundary of the project site (Figure 1-4). Although the County of San Diego Listing has indicated that no recorded violations have occurred from these tanks, there is a possibility for unrecorded violations in the past that may have resulted in soil contamination in the existing maintenance facility area. New staff housing is proposed for this area, which would involve future grading and construction activities in this potentially contaminated area. Additionally, the removal and relocation of these above-ground storage tanks could result in accidental leaks or spills. Therefore, impacts from the proposed tank removals are considered potentially significant.

The project site lies outside any mapped dam inundation area for major dams/reservoirs within San Diego County, as identified on inundation maps prepared by dam owners. The project is located within the jurisdiction of the San Diego County Operational Area Emergency Plan (OAEP) and also has an established internal Disaster Plan. There are no Federal Emergency Management Agency-mapped floodplains on or in the general vicinity of the project site. The proposed project has been designed so that structures would not be subject to inundation from a 100-year storm, which is defined as a storm that has a one percent probability of being equaled or exceeded in any one year. Additionally, on-site wetlands, which provide floodwater retention, would be preserved under the proposed project. Therefore, the proposed project is compliant with all adopted emergency response and emergency evacuation plans and impacts associated with flooding would not be significant.

~~In addition to the updated Emergency Procedures described above, t~~The proposed project includes several improvements to the existing water system. At the request of the Salvation Army, the RMWD Department of Engineering commissioned a hydraulic analysis of the water system in Mussey Grade Road including the effects of the proposed campground expansion. The results of the water system analysis for the camp and recommendations for improvements are contained in a report dated January 23, 2002 (RMWD, 2002). This analysis demonstrates that with proposed infrastructure improvements there will be sufficient water infrastructure and capacity to serve the project in a wildfire event.

Based on the 2002 study report, the RMWD established water system requirements for the campground. The requirements include a 260,000 gallon tank (expandable to one million gallons) at a base elevation of 1,665 feet. The tank will be connected to the existing main in Mussey Grade Road through two pipeline extensions in a five valve package. The water tank and all pipelines and appurtenances connecting to the main in Mussey Grade Road are to be public and~~,~~ dedicated to the RMWD.

Water for domestic use, irrigation and fire protection will be supplied by a new ten-inch diameter water main located on the project site ~~where~~ as shown on the Proposed Site Plan. The RMWD's water main located off-site in Mussey Grade Road is currently not adequate to effectively fight wildfires. The existing water main located in Mussey Grade Road is a six-inch diameter, dead-end pipe extending south to Fernbrook Drive. Although the static pressure in the system is adequate, properties to the south cannot

pull enough water through the pipe to fight major fires, and have a marginally reliable water supply at other times. The new proposed ten-inch main ~~will be approximately three feet beneath the surface of the ground. The main~~ will tie into the existing six-inch diameter water main in Mussey Grade Road near the entrance to the property. From there it will run south near the westerly property boundary a distance of approximately 1,900 feet, then continue south and west beneath the existing camp roadway through Areas 4 and 2 an additional 3,800 feet. On the hillside west of and above ~~a~~Area 2 the water main will connect to ~~a~~ the new 260,000-gallon water storage tank. The tank will be approximately 60 feet in diameter and 13 feet high. The tank will be at an elevation consistent with the existing pressure zone, so no pump stations or reducing stations will be necessary. The system as designed will provide sufficient fire flow for the proposed Divisional Camp and Retreat Center. It will also add much needed reliability (but not additional capacity) to the existing water distribution system in Mussey Grade Road. The proposed 260,000 gallon tank is larger than needed for the campground alone. In fact, the tank size is based on supplying both domestic and fire needs of all the existing properties in the 2,217-acre service area between the campground and the end of the line at Fernbrook Drive. This includes all properties within the RMWD boundaries along Mussey Grade Road. The 2002 study report prepared for the RMWD states as follows:

> *Implementation of this recommendation improves the Mussey Grade Road community water distribution system in the following ways:*
>
> *1. Dramatically improves the fire flow to the Mussey Grade Road fire hydrant locations;*
>
> *2. Allows for greater operational and emergency water storage should pipeline breaks or shut-downs occur; and,*
>
> *3. Eliminates the need for the Mussey Grade Pressure Reducing Valve.*

Fire hydrants, fire service laterals, valves and meters will be installed on-site as required by the Ramona Municipal water District and the Fire Marshal.

The new water main, storage tank and appurtenances will be public - operated and maintained by the RMWD. Easements as necessary will be dedicated to the ~~District~~RMWD. All of the parcels to be served will be within the boundaries of the RMWD with the proposed annexation of the 10.8-acre parcel in the north central portion of the site.

Impact 2.3.b The Salvation Army property is located in a rural setting that is largely covered with highly flammable native and non-native vegetation. ~~As discussed above, the area experienced a wildfire in 1995 and more recently in October 2003.~~ Additional development in outlying areas, including the proposed project, would result in an increase in visitors to the area, which could expose a greater ~~amount~~ number of people to potential fire hazards. Therefore, the proposed project would result in a significant impact.

2.3.3.1 Fire Risk Analysis

The level of fire risk for the project site was evaluated, culminating in the preparation of a detailed Fire Protection Plan (FPP) for the project site and the camp operations. Fire Risk analysis methodology included field assessment, fire response, estimated calls and demand for service from the project, and fire behavior modeling.

The vegetation characteristics of the project site are used to model fire behavior. Variations in vegetative cover type and species composition have a direct effect on fire behavior. The native shrub species that compose the chaparral and coastal sage-chaparral scrub plant communities on the project site are a high potential hazard. Vegetation distribution throughout the site varies by location and topography. Riparian woodlands and scrub are concentrated in canyon bottoms and low, flatter areas, while upland areas typically support shrub cover (either coastal sage scrub or chaparral) or grass cover. Vegetation cover affects fire behavior. For example, fire burning in grasslands may have shorter flame lengths than those burning in chaparral or coastal sage scrub; however, fire in grasslands often spreads much rapidly than fire in other vegetation types.

Fire behavior modeling was conducted to document the type and intensity of fire that would be expected on the project site given the characteristics of the project site including topography, vegetation, and weather (see Appendix J, 3.0 for a detailed discussion of fire risk analysis methodology). A FlamMap model was prepared, which is a graphics-based GIS model that evaluates anticipated fire intensity at the project site and flame length values based on variations in topography and vegetative cover, and provides a graphic output that can be evaluated on site maps. EIR Appendix J, provides a large-scale plot of the FlamMap output. This FlamMap shows the locations of the predicted flame lengths on the project site; thereby allowing appropriate fuel modification zones to be identified. As a result of the FlamMap output, appropriate fuel modification zones have been identified and incorporated into the FPP.

As experienced as recently as 2003, the Salvation Army Divisional Camp site is vulnerable to wildfires given the climate, vegetation, wildland urban interface location, and topographical characteristics of the area, along with the fire history and behavior modeling results discussed in the FPP. The most common type of fire anticipated in the vicinity of the project area is a wind-driven fire from the north/northeast during the fall. Flame lengths can reach over 45 feet.

2.3.3.2 Fire Safety Requirements

A. Fuel Modification Zones

The FPP provides the framework for fire prevention planning for the project site based on the analysis conducted with respect to the existing conditions of the project site and proposed project components.

An important component of the FPP is the proposed fuel modification area (brush clearance). Fuel modification areas are designed to gradually reduce fire intensity and flame lengths from advancing fire by placing thinning zones, restricted vegetation zones, and irrigated zones adjacent to each other on the perimeter of all structures.

As discussed in the following sections, a minimum of 100 feet of fuel modification area is required by San Diego County and the state Public Resources Code in State Responsibility Areas (SRAs). The proposed project meets this requirement as described below.

As shown in the FlamMap (see EIR Appendix J), there are three proposed types of fuel modifications zones. Zone 1 is the Non-Flammable, Irrigated Zone (50 feet around structure), Zone 2 – Non-Flammable, Reduced-Fuel Zone (51 to 100 feet from structure), and Zone 3 – Modified Fuel Modification Zone for Shelter in Place and Highest Potential Hazard Areas (101 to 175 feet from structure). Specifications of these zones are provided in Appendix J.

For the proposed project site, recommended fuel modification areas are, at a minimum, twice as wide as the predicted flame lengths and in some areas up to 20 times as wide as the predicted flame lengths. The proposed fuel modification zones are depicted in the FlamMap Exhibit (see EIR Figure 1-4 and EIR Appendix J). The proposed fuel modification area works in tandem with the other components of the fire protection system, including ignition-resistant construction, interior sprinklers, infrastructure upgrades, and water supply improvements. The proposed water system improvements are described in the preceding text. These plan components provide the ability for visitors to shelter in place within designated structures.

B. Structural Shelter in Place – Fuel Modification Width

Typical fuel modification widths in California and San Diego County for structures adjacent to the wildland urban interface (WUI) are at a minimum 100 feet and can be wider for steeper terrain and heavy, highly flammable fuels, such as chaparral. For shelter-in-place structures, it is prudent to provide more than 100 feet of fuel modification zone protection, up to as much as four times the predicted flame lengths. On the proposed project site, the longest flame length under worst-case conditions is predicted to be 45 feet (Appendix J), primarily on the slopes to the north and west of the project site. Based on the terrain and other site-specific characteristics, the maximum fuel modification width prescribed for this site adjacent to the mixed chaparral is 175 feet in the steepest and heaviest fuel areas, such as just north of the cluster of buildings proposed in the northernmost area which is located to the south of a natural landform known as a "saddle." Other areas are prescribed for the standard 100-foot fuel modification zone. In all cases, fuel modification zones that are a minimum of two times the predicated maximum flame length will be provided and in the highest severity areas, up to six times the flame length would be provided. Based on positioning of green areas, recreation fields, and other urbanized landscapes, and the proximity of low-flame length producing fuel types like grass, fuel modification widths of 20 times predicted flame lengths have been achieved (Appendix J) in some areas including as measured from the eastern boundaries of the camp to proposed structures (Areas 1, 2, 3, and 4).

The FPP identifies the proposed multi-purpose building as the designated shelter-in-place structure. This designated shelter-in-place structure is one of the largest facilities planned for the site, a 19,500-square-foot multipurpose structure, and it includes fuel modification zones equaling nearly six times the predicted flame length to the northwest of the structure and up to 20 times predicted flame lengths on the other exposures. This structure would accommodate up to 1,300 people, as calculated according to the California Building Code, Table 10-A, Building Code Section 1003.2.2. Based on the number of camp visitors

and staff expected onsite at any one time, there would be a surplus of shelter-in-place space that would be available to local residents of Mussey Grade Road in case of fire emergencies.

C. Roads

The FPP requires that site access comply with the requirements of the California Fire Code (Section 902.2). Standards for road widths and circulation, interior circulation roads, gates, and driveways are provided by Code. As stated in the FPP, the RMWD requested, and the County of San Diego granted an Exception to Road Standards based on secondary access (see Appendix J of the FPP).

D. Structures

The FPP outlines the ignition-resistant construction (for all structures) that will meet the requirements of the Ramona Fire Department (California Fire Code). These requirements, as they pertain to the project site, are summarized in the FPP.

E. Fire Protection Systems

The FPP provides requirements for the infrastructure components of the proposed project. These requirements address fire hydrants, fire sprinklers, fire alarm systems, and a facility-wide alarm system. These requirements are made in order to comply with Ramona Fire Department requirements, Chapter 47 of the County Fire Code; Chapter 7A, County Building Code, and nationally-accepted fire protection standards including the 2006 International Wildland-Urban Interface Code, as well as consultant's recommendations to assist in providing reasonable on-site fire protection.

F. Emergency Planning

Although wildfires can occur any time of the year, they are more likely to become uncontrollable during the period of September to February, coinciding with the Santa Ana winds. The proposed project could accommodate 615 persons, but the typical Camp population during the period of September to February will be much lower, around 200 persons, as children would be in school during this period.

The Salvation Army Procedures document is included as Appendix I of the FPP (EIR, Appendix J). The emergency procedures document was accepted by the RMWD in 2004 and is signed by the RMWD Fire Marshall. Emergency procedures include maintaining two large-capacity buses (60 people each) with drivers, or other equivalent vans or buses on the premises; the Salvation Army shall conduct a fire drill the first day of every camp period; and the RFD has agreed to and shall observe an annual fire relocation drill/fire drill exercise to ensure proper safety measures have been implemented.

The Salvation Army Divisional Camp is and will continue to be accredited by the American Camping Association. Requirements for this accreditation include written procedures specific to the site for various topics including response to storms, earthquakes, fire or other emergencies. Written materials can be found posted in buildings throughout the Camp.

G. Relocation (Camp Evacuation)

As identified in the approved Emergency Procedures Document, in case of fire, the preferred plan is to evacuate the Camp. The plan includes policies and procedures to prevent serious fire risks, as well as a Fire Emergency Plan that details the relocation plan and emergency transportation plan.

The Camp and its structures will be designed and constructed to withstand significant wildfire. Nevertheless, early notification of the Camp administrators and subsequently of Camp staff and visitors is critical to the timely and safe relocation to the designated evacuation areas.

On the first day of every camp period including new campers, the Salvation Army will conduct a fire relocation/fire drill to train campers on what to do during a wildfire and where to assemble. This drill will be observed by the Ramona Fire Department at least annually. Ramona Fire Department may require the Salvation Army to revise the procedure as necessary to provide the most efficient and safest relocation process.

If a relocation of Camp staff and visitors were required, the following procedures would be followed. Relocation (evacuation) of the Camp and its visitors, at maximum usage, may require in excess of an hour. If adequate time is not available, the decision to remain in the shelter-in-place site will be made, with the assistance of fire and law enforcement personnel, and relocation will cease. Local residents of Mussey Grade Road who may not have a designated safe site will also be directed to the shelter-in-place facility if adequate relocation (evacuation) time is not available.

Two large-capacity buses (120 total people, 60 people each) would be stationed at the Camp at all times. These buses, along with other vans and personal vehicles, could be utilized during a relocation effort.

- Designated Camp buses, vans and passenger cars would be mobilized and loaded with Camp visitors and staff.
- The vehicles would exit the site via the primary site access off Mussey Grade Road.
- The vehicles would convoy north on Mussey Grade Road to the Ramona United Methodist Church at 3349 Chapel Lane (Hwy 67 and Dye Road).
- Once unloaded and given an update on the situation, the vehicles would either proceed back to the Camp for additional people or remain at the church if conditions would not warrant a return.
- As long as conditions warranted return trips for more people, the vehicles would make the approximately 12- to 15-minute trip until all staff and visitors were relocated.
- If the maximum 640 people were on site and were to be relocated, between buses, vans and personal vehicles, it is estimated that 150 people could be relocated in each trip. Round trip from the Salvation Army Divisional Camp site to the United Methodist Church and back takes approximately 12 to 15 minutes under normal conditions. At that rate, the Camp staff, visitors and campers could be relocated within approximately 1 hour.

- Persons relocated to the Church would be temporarily housed at the Church until they could return to the Camp or were relocated to their respective homes outside the area at risk.

Mussey Grade Road Evacuation Analysis

In response to comments on the Draft EIR, the following assessment of the potential impacts of the proposed project's traffic on Mussey Grade Road under evacuation conditions, as might be expected as a result of a wildfire like the Cedar Fire in 2003.

Methodology

To assess the roadway operations both pre-and-post project under evacuation conditions, the first step was to calculate the potential traffic on the roadway. A peak hour number was used, since the evacuation is assumed to occur over a one-hour period.

Next, the theoretical capacity of a one-lane roadway was needed. There are no "look-up" tables for one-lane roadways in the County's published roadway capacities. The Highway Capacity Manual (HCM) was reviewed for both arterial and 2-lane highways to determine an appropriate capacity.

Finally, the analysis consisted of traffic volumes with and without the project measured against the one-lane roadway capacity. Again, no published significance criteria exist to determine if the project would have a significant impact.

Volumes

A 24-hour road tube count was done on Mussey Grade Road both north and south of Dos Picos Park Road on a weekday in June 2004. This traffic count captured the two-way traffic on Mussey Grade Road for 24-hours. The vast majority of traffic was generated by residential trips in the area, although some campsite activity was likely occurring. The highest count was 3,240 trips, which occurred north of Dos Picos Park.

The residences in the area were assumed to be on 1-acre or larger lots. SANDAG published rate of 12 trips/acre was used for these "estate" lots. Not accounting for the small usage assumed at Dos Picos Park on the count date, the number of lots using Mussey Grade Road is roughly calculated by dividing the total ADT by the number of trips per estate lot. This calculation is 3,240 ADT/12 trips per lot, or about 270 lots.

The analysis assumed that all vehicles on a site will be driven, if possible, during an evacuation. Thus, a family of four with three cars will not typically evacuate in one car if there are other drivers in the group. The analysis assumed that for the 270 lots, each lot would have, on average, three drivers and three cars. Thus, 810 vehicles (270 units 3 cars & drivers/lot) could be expected to leave at once during an evacuation.

The project is calculated to add a maximum of 275 ADT to Mussey Grade Road, or about 140 one-way trips. This calculation assumes that there are both campus and retreat guests on-site (Full camp capacity). The project's evacuation plan would provide for 2 busses on-site to evacuate the campers

(2 one-way trips). This evacuation scenario (no retreat guests and bussing of campers would require many fewer trips than the 140 trips referenced from the traffic study trip generation.

In summary, the volumes calculated without the project are 810 trips and with the project are 950 trips.

Capacity

With the volumes established, it was then necessary to establish an appropriate peak hour capacity for one-lane of Mussey Grade Road to complete the analysis. The County typically conducts segment analyses for two directions of traffic on a 24-hour basis (i.e. 16,200 ADT = LOS F). Since the analysis was based on a peak hour volume in one lane, a different approach was required.

Several sections of the nationally accepted Highway Capacity Manual (HCM) were reviewed for information. The published HCM is the basis of the majority of the methodology used in signalized/unsignalized intersection calculations, arterial analyses, freeway analysis and two-lane highway calculations.

A commonly accepted hourly capacity for a single two-lane highway lane is 1,700-passenger cars/hour (pc/h). This is confirmed in the HCM. For the purposes of this analysis, Mussey Grade Road is considered to exhibit characteristics more similar to a 2-lane highway than an urban arterial. The latter carries higher volumes and has signalized cross streets. There are relatively few driveways and intersections along Mussey Grade Road as compared to a typical urban two-lane County roadway. Also, roadway "friction" in terms of opposing vehicles (i.e. southbound vehicles) under evacuation scenarios will be minimal with all outbound traffic heading northbound in one lane. However, given the narrower lanes and lack of shoulder as compared to a proper 2-lane highway, the two-lane highway lane capacity by 20%, resulting in an hourly, per-lane capacity of 1,360 pc/h.

Summary

The peak hour evacuation volumes calculated for Mussey Grade Road are 810 pc/h without the project, and 950 pc/h with the project. The hourly capacity of the road is conservatively estimated at 1,360 pc/h, with factors such as narrow lanes and lack of shoulders accounted for. Thus, the expected volumes are within the capacity either without or with the project. When the retreat at the project site is not operating (when it is not occupied), the project volumes are much less, since two busses will be on-site at all times for evacuation purposes.

The evacuation of Mussey Grade Road and other similar roads in the County rely on the expeditious movement of traffic from the minor street to the major street. That is, if traffic congestion on SR-67 precludes the movement of vehicles from Mussey Grade Road on to SR-67, then capacity may be reduced below what is presented in this analysis. However, emergency personnel would be responsible for directing traffic at key intersections, such as SR-67/Mussey Grade Road, during an emergency so that an orderly and expeditious evacuation flow could occur.

Finally, if the evacuation period lasts longer than one hour (as assumed in this analysis), the volumes calculated for Mussey Grade Road may be much less on a per hour basis.

Sheltering in Place

If relocation /camp evacuation is not an option as determined by fire personnel or Camp administrators, the Camp will implement the shelter-in-place alternative.

As detailed in the FPP, the project features including site-specific fuel modification zones, enhanced ignition-resistant construction, interior sprinklers, and infrastructure improvements are designed to provide safe areas for sheltering during a wild fire.

The proposed multipurpose building (Figure 1-8) has been identified as a large-capacity building that will be used for shelter in place. The building offers 19,500 square feet of interior space, which could easily accommodate the maximum 615 persons that may be on site. The structure could accommodate up to 1,300 persons according to the California Building Code. As such, residents from the Mussey Grade Road area could relocate to this structure during a fire emergency. Although the preferred shelter-in-place scenario includes temporarily housing all persons in the multipurpose building, all of the site's structures will be built to the same standards and have fuel modification areas and could be used for temporary shelter in an extreme situation.

The Ramona Fire Department will inspect the fuel modification areas, construction features, fire protection systems, and infrastructure to ensure that they meet the requirements specified in the FPP. Therefore, the shelter-in-place option will be available at all times.

Same Practical Effect for Non-Conforming Secondary Access

In a December 19, 2007, the RMWD "reaffirmed its previous position that a condition of approval of the expansion of the Salvation Army Camp be the acquisition and development of a secondary access for ingress and egress from the Camp." The County believes that a secondary access is not possible due to practical difficulties, and there are several reasons why the County is under no obligation to require a secondary access as a condition of the Major Use Permit.

First, although County Fire Code section 96.1.503.1.2 (effective January 30, 2008) requires the proposed project to have a secondary emergency access, Appendix Chapter 1, section 104.8 of the code allows modifications of the code requirements for individual projects under certain circumstances.

Ralph Steinhoff, Fire Services Coordinator of the County Department of Planning and Land Use (DPLU) reviewed the fire risk analysis for the proposed project and the fire protection plan as described in EIR sections 2.3.3.1 and 2.3.3.2 above. Mr. Steinhoff found that construction of a secondary access would be impractical as explained in section 2.3.3.2 "Secondary Emergency Access Road."

In addition, Mr. Steinhoff determined that due to various project features (busses on site for relocation, ignition resistant construction materials, fuel modification around buildings, water tank on site, shelter-in-place facility, improved primary access, etc) the lack of a secondary access would comply with the intent and purpose of the code and would not lessen health, life and safety requirements.

Mr. Steinhoff has extensive experience in wildland and structural fire control, Incident Command, incident recovery and community fire defenses planning. He has more than 35 years of experience and accomplishments in the fire service. His career includes eight years as a company officer and 16 years as a chief officer eventually retiring from the North County Fire Protection District with the rank of Deputy Chief. He holds a Bachelor of Science from the University of Redlands and an Associate in Science, Fire Science, from Miramar College. He is a California State Certified Fire Officer, Chief Officer and Fire Marshal. He is a former "Fire Prevention Officer of the Year" for the San Diego County Fire Prevention Officers Association.

Second, the project site is located in a State Responsibility Area (SRA) and, therefore, the fire regulations in California Code of Regulations, title 14, section 1270 and following apply. The proposed project does not comply with the maximum length of dead end roads specified in 14 CCR section 1273.09. However, 14 CCR section 1270.07 authorizes exceptions to these regulations if the exception provides the same "overall practical effect as the regulations towards providing defensible space." Mr. Steinhoff determined that the following project features would meet the "same- overall-practical-effect" standard:

- On-site roads meet the 24-feet-wide unobstructed criteria (except where avoiding sensitive biological resources) surfaces are asphalt except where all-weather decomposed granite is proposed, multiple fire apparatus turnarounds are provided and dead end roads and cul-de-sacs are consistent with County Fire Code. The requirements of the County Fire Code are more restrictive than the State Fire Code.
- Vegetation clearance is proposed that exceeds twice the calculated flame length and in some cases exceeds twenty times the calculated flame length.
- All new buildings must meet the County's ignition-resistant exterior construction standards, which exceed state building code standards for wildfire areas.
- All new buildings will have fire sprinkler systems providing safety for occupants and reducing the potential for structural fires to spread to vegetation. Generally, the sprinklers are plumbed so that if one triggers, it will trigger a series of them in the same area, but not all of the sprinklers in the structure.
- Water system enhancements, including dramatically improved water availability (270,000 gallons), fire flow, water pressure throughout Mussey Grade Road and better access to fire hydrants throughout the Salvation Army site, will significantly improve the capability to fight fires on site and in the lower portion of Mussey Grade Road.
- People on site will be in a structured environment that has responsible leadership (counselors and group leaders), state-mandated fire orientation at the beginning of each session, a site-wide fire alarm system, and prescribed fire action plan.
- Vehicles will be kept on-site to relocate people from the site in a fire emergency as described in the FPP.

- If relocation is not feasible, the multipurpose building on site will provide a "shelter-in-place" structure that will be protected by extensive vegetation clearing, ignition resistant construction materials, and fire sprinklers. This structure will have sufficient capacity to accommodate off-site residents from Mussey Grade Road who might not be able to evacuate, in addition to the people on site.

Third, under the County's land use authority, the County decides whether to issue a Major Use Permit and what conditions to include in the permit. Article XI, section 7 of the State Constitution grants broad police powers to cities and counties. "The courts have liberally construed this grant of police power to counties and cities, in the field of land use regulations" Longtin, California Land Use, (2nd ed. 1987), p. 43). Consistent with this broad grant of constitutional authority, Government Code section 65800 states that the legislature intends "to provide only a minimum of limitation in order that counties and cities may exercise the maximum degree of control over local zoning matters."

Ordinances that authorize the issuance of conditional use permits are a common means of exercising the police power in the land use area [O'Hagen v. Board of Zoning Adjustment 19 Cal.App.3d 151, 158 (1971)]. Accordingly, County Zoning Ordinance section 7350 and following authorize the County to issue Major Use Permits. In approving these permits, the County may impose conditions that it determines are necessary (Zoning Ord. § 7362). Neither the Zoning Ordinance nor any other law requires the County to impose conditions that a fire district, or any other district, believes are necessary for a particular project. The authority to issue a Major Use Permit and to decide what conditions to include in the permit rests solely with the County. As explained above, the County has determined that a secondary access is not necessary.

Lastly, it should be noted that on September 28, 2004, Steve Deladago, the Fire Marshal for RMWD, reviewed and approved the evacuation and safety plan for the proposed project without requiring a secondary emergency access. In addition, on April 26, 2002, Kenneth Miller, Unit Chief, California Department of Forestry and Fire Protection, reviewed and approved the same plan for the proposed project without requiring a secondary emergency access. A copy of these approvals is attached in Appendix K.

The mitigation measures provided in the FPP are designed to provide the *same practical effect* that a secondary access would provide. A secondary access would address concerns about fire-or-traffic blocked resident egress and delayed or denied firefighter ingress. As such, the measures provided in the CFPP include shelter-in-place construction, fuel modification standards, landscape plan reviews and approvals, and annual landscape inspections and enforcement. When sufficient relocation time is not available, the Camp will provide shelter in place in a large multipurpose building that can accommodate up to 1,300 people. Shelter-in-place will be an alternative to relocation (evacuation), but on this site, will be an option for campers, staff, visitors and local residents. These measures achieve *same practical effect toward providing defensible space*. These measures are proven to reduce fire spread, reduce radiant heat from burning landscaping, reduce the likelihood that fire will reach structures and minimize risk to persons from interior fire, thereby, providing a place on-site to shelter rather than evacuating via Mussey Grade Road or a secondary access.

Secondary Emergency Access Road

The RMWD Board, at its meeting on November 13, 2007, reaffirmed its position that a secondary access road be required as a condition of approval of the Major Use Permit. The secondary access road would be required to connect from the Salvation Army camp to either Dos Picos Park Road or SR-67. The purpose of this secondary access road would be to provide an additional access to and from the camp, thereby alleviating the potential traffic load on Mussey Grade Road in the event of a wildfire emergency and evacuation of the camp. Residents on Mussey Grade Road have identified the project's potential impact on Mussey Grade Road in the event of a wildfire emergency as an issue associated with the project. However, as discussed in the FPP (EIR Appendix J) and preceding text, provision of a secondary emergency access road has been determined to not be necessary, as the *same practical effect* of providing a secondary emergency access road will be achieved through implementation of the measures identified in the FPP. These measures are proven to reduce the fire spread, reduce radiant heat from burning landscaping, reduce the likelihood that fire will reach structures and minimize risk to persons from interior fire, thereby, providing a place on-site to shelter rather than evacuating via Mussey Grade Road or a secondary access. Furthermore, provision of a secondary emergency access road is infeasible due to the various engineering, environmental, land use, ownership, and cost constraints involved with construction of any of the potential roadway alignments through this highly constrained area. Primary constraints include the presence of very steep topography (often exceeding 50% slopes), as well as sensitive biological resources. Constraints also include land use policies and ordinances (e.g. the County's Resource Protection Ordinance), ownership patterns, constraints, and engineering, construction, and mitigation costs.

In order to provide a connection to Dos Picos Park Road or SR-67, the secondary access road would need to extend either north, or northwesterly from the project site. Direct access to the south would not achieve the goal of connecting to Dos Picos Park Road or SR-67. Direct access to the west is prohibited by steep slopes exceeding 50%, the presence of MHPA preserve lands, and the Iron Mountain Golden Eagle nest site (impacts within 4,000 feet of a golden eagle nest site are not allowed under the MSCP (species-specific conditions of coverage) and the BMO Section 86.507(a)(2)(a)). As such, two possible routes for the provision of emergency access from the Camp have been identified and analyzed in greater detail: (1) a northerly route that would extend across the Golden Eagle Horse Ranch to Dos Picos Park Road; and, (2) a northwesterly route that would extend to SR-67. Figures 2.3-1 and 2.3-2 depict the conceptual alignments of each of these routes, respectively. Figure 2.3-3 depicts the steep slope categories and the location of U.S.G.S. Blueline streams, all of which are likely subject to regulation by the County, the California Department of Fish and Game, and the U.S. Army Corps of Engineers. It should be noted that no formal jurisdictional wetland delineation has been performed for streams identified off-site. Figure 2.3-4 depicts the parcel ownership pattern in the area. Figure 2.3-5 depicts the general biological constraints (MHPA lands, golden eagle nest buffer). Figure 2.3-6 depicts the vegetation communities that would be impacted by either roadway alignment.

For either route, the road is assumed to consist of a 24-foot wide road within a 26-foot wide graded easement. Surfacing would be as required by the County of San Diego - decomposed granite or asphaltic cement depending on the slope. Manufactured slopes would be at a slope ratio of 2:1 horizontal to vertical. It has also been assumed that wetland crossings (e.g., jurisdictional drainages) will require

clear-span bridges, as they would otherwise not be permitted by the County and/or regulatory agencies such as the U.S. Army Corps of Engineers and the California Regional Water Quality Control Board.

For biological constraints, existing project data and regional Geographic Information Systems (GIS) data were utilized to identify sensitive biological resources that should be avoided and would, therefore, potentially constrain roadway development.

Potential biological constraints include the following:

- County RPO jurisdictional wetlands and wetland buffers;
- Biological Open Space Easements and Multiple Habitat Preserve Areas (MHPA) subject to BMO Attachment G, Preserve Design Criteria;
- Wildlife corridors addressed by BMO Attachment H, Design Criteria for Linkages and Corridors and subject to RPO restrictions on the development of "sensitive habitat lands"; and
- The MSCP-required 4,000-foot avoidance area surrounding any golden eagle (*Aquila chrysaetos*) nest.

Northerly Route across the Golden Eagle Horse Ranch to Dos Picos Park Road

Engineering Constraints

The conceptual northerly route that would extend across the Golden Eagle Horse Ranch to Dos Picos Park would be approximately 6,000 feet, or 1.13 miles in length (See Figure 2.3-1). The offsite portion would be approximately 3,600 feet (0.7 miles) in length. This route would be of limited value in meeting the RMWD Board's stated purpose of a secondary emergency access road, because it would connect the camp to Dos Picos Park Road, which is a dead-end street located off of Mussey Grade Road and it would not connect to SR-67. Therefore, vehicles exiting the camp would still need to use Mussey Grade Road (via Dos Picos Park Road) in order to evacuate the area. There is a private driveway leading from Dos Picos Park into the hills to the west, but there is no easement that allows public access through this area. Construction of this access road would require grading of steep slope areas that exceed 50%, and therefore would not be consistent with the County's RPO regarding the protection of steep slopes. Furthermore, in association with the West Fork of San Vicente Creek, in the project's north and northwest, a local wildlife corridor has been identified. This corridor allows for movement from the southeast to the west (and vice versa) into and out of MHPA lands. Building a secondary access road to the north to connect to Dos Pico Park Road would bisect the wildlife corridor. Construction of a northern secondary access road, impacting the wildlife corridor, would be prohibited under the RPO.

Northwesterly Route to SR-67

Engineering Constraints

The northwesterly route connecting to SR-67 would be approximately 14,500 or 2.75 miles in length (see Figure 2.3-2). The offsite portion would be approximately 11,200 feet or 2.12 miles in length.

The alignment shown would conform to the terrain as much as possible; however, at least 6,700 lineal feet (nearly half of the road's length) would traverse land with a natural slope exceeding 50% due to the predominance of steep slopes in the area (see Figure 2.3-3). Only approximately 4,800 lineal feet, (about one third of the road) would traverse land with a natural slope less than 25%; however, this grade is too steep for emergency vehicles.

Cost

The estimated engineering and construction cost for the northwesterly route to Highway 67 is approximately 6.3 million dollars. Again, this estimate does not include easement (right of way) acquisition or environmental mitigation. The cost estimates are based on general conditions, contingency, design and permit processing.

Biological/County Ordinance Constraints

Access directly to the west is constrained by Iron Mountain/MHPA lands. Land uses allowed within MHPA lands/the MSCP preserve do not include roads related to private property access, only public infrastructure. Therefore, the secondary access road would not be allowed to traverse these lands. Construction of this road would require crossing at least four, and possibly five U.S.G.S. "blueline" streams as mapped by the U.S.G.S. These streams are likely considered RPO wetlands.

Construction of this secondary access road would result in the disturbance of approximately 29.32 acres of land, with 97% of it sensitive habitat. This road would be located within 1,700 feet of the Iron Mountain golden eagle nest site. Development within 4,000 feet of a golden eagle next site is not allowed under the MSCP (species-specific conditions of coverage) and the BMO Sec 86.507(a)(2)(a).

Ownership

This roadway alignment would traverse at least 12 and possibly as many as 14 properties including the following Assessor's Parcels: 278-391-04, 278-391-05, 278-391-07, 278-391-09, 278-391-10, 278-391-11, 278-392-04, 278-270-16, 322-020-07, 322-020-08, 322-020-09, 322-020-10, 322-020-11, and 322-030-09. Easements would need to be obtained, or right of way purchased from each of these property owners.

In conclusion, provision of a secondary access route to the north or northwest is not feasible due to the significant engineering, construction, and mitigation costs, as well as the fact that easements would have to be obtained on as many as 14 properties.

2.3.4 Mitigation Measures

MM 2.3.a Removal of the two above-ground fuel storage tanks shall comply with all applicable federal, state and local regulations. Any necessary permits shall be obtained prior to removal and relocation. An amendment to the Business Plan shall be approved prior to relocation of the above-ground storage tanks. ~~A preliminary Phase I~~ An Environmental Site Assessment (ESA) will be performed to test for potential soil contamination from the tanks in the existing maintenance yard. The Salvation Army will follow all recommended remediation measures outlined in the ~~Phase I~~ ESA. In addition, the Salvation Army will consult with the

Ramona Fire Department prior to relocating the tanks for appropriate approval of the new tank location (pers. comm., Delgadillo, S. Ramona Fire Department, April 2000). The new tank location shall be limited to existing developed areas within the project site. The relocated tanks shall be UL-2085 tanks as required by code.

MM 2.3.b The Fire Protection measures and requirements, as identified in the Salvation Army Divisional Camp Fire Protection Plan (Dudek, April 2008) shall be implemented.

~~MM 2.3.b~~ The following conditions shall be included in the Major Use Permit to mitigate for Hazards and Public Safety impacts related to potential fires in the project area.

- The Ramona Fire Department determined that a 260,000-gallon water tank at an elevation of approximately 1,665 MSL with a ten-inch on-site water line that connects to the existing six-inch water main in Mussey Grade Road will meet fire flow requirements for the project and will also enhance the flow capacity to fight future fires in the project area. Prior to issuance of building permits, the applicant shall submit to the County, plans approved by the Ramona Municipal Water District Engineering Department for a water system capable of handling the fire flow requirements for the project (existing and proposed buildings).
- Prior to the issuance of building permits the appropriate number of fire hydrants and their specific locations, approved by the ~~Ramona Fire Department~~RMWD, will be identified and constructed.
- Automatic sprinklers shall be installed in all existing and new buildings, consistent with the Ramona Fire Code Ordinance 99-199. This shall be ~~determined after~~verified when the water system plans are approved.
- All on-site roads shall be improved to a minimum 24-foot width with paved surfacing, with the exception of those designated as "existing access road to remain, road not to be paved," (item #4), and "existing road width to remain, road to be paved," as shown on the "Fire Marshal Exhibit: Proposed Site Plan," dated 1/15/02, and revised 4/18/02 and 5/1/02 (Appendix H).
- A lighted map directory shall be provided at every intersection within the proposed project denoting, with numbers, the areas on-site that the particular road leads to.
- "No Parking Fire Lane" signs shall be posted on all roads that have the fire department required width of 24 feet. The number of signs and their placement shall be determined by the Ramona Fire Department.
- A fuel modification zone a minimum of 100 feet in width will be provided around the entire perimeter of each building site, as depicted on the site plan, consistent with Ramona Fire Code Ordinance 99-199.

- A ten-foot wide fuel modification zone shall ~~occur~~ be provided along each side of all fire access roadways.
- The following are exceptions to the fuel modification requirements above ~~are granted per the Fire Code~~:
  - Single specimens of trees, ornamental shrubbery or similar plants used as ground covers, provided that they do not form a means of rapidly transmitting fire from the native growth to any structure.
  - Grass and other vegetation located more than 30 feet from buildings or structures and less than 18 inches (457 mm) in height above the ground need not be removed where necessary to stabilize the soil and prevent erosion.
  - With the approval of the fire authority having jurisdiction, the width of the fuel modification zone may be reduced where fire-resistive structures or other features are constructed. However, in no case shall the fuel modification zone be reduced to less than 30 feet.
- Prior to issuance of building permits, a fire alarm system shall be provided.
- A response map update in a format compatible with current department mapping shall be provided, as specified in the Ramona Fire Code Ordinance 99-199.
- The Salvation Army shall, at all times, have two large capacity school buses with drivers or other equivalent vans or buses on the premises at all times when children are attending camp.
- The Salvation Army shall conduct a fire drill the first day of every camp period.
- The ~~Ramona Fire Department~~RMWD has agreed to~~, and shall~~ observe an annual fire evacuation/fire drill exercise to ensure proper safety measures have been implemented. After this annual observation and review, the ~~fire department~~RMWD may require more than two large capacity school buses with drivers to be available at the camp for evacuation purposes. To protect family or adult campers who were transported to the camp by bus or van, the ~~Ramona Fire Department~~RMWD may also require one or more additional buses with drivers to be available to evacuate the campers or may require other protective measures.
- ~~The yurts will have skirting installed in a manner similar to skirting on trailer or mobile homes.~~

2.3.5 Conclusions

Proper removal and relocation of the two above-ground storage tanks according to all applicable federal, state, and local regulations would reduce the possibility of accidental leaks or spills during this process. Mitigation measures for fire, as identified in the FPP (Dudek, 2008, EIR Appendix J) ~~including the construction of an adequate water system, installation of sprinklers in all new buildings, implementation of fuel modifications and fire clearance zones, and measures to make the camp accessible to emergency vehicles would ensure that all necessary precautions have been taken to~~ will be implemented as a

condition of the MUP and will protect the Salvation Army Divisional Camp's buildings, employees and guests from the threat of wildland fires. Incorporation of the mitigation measures ~~detailed~~ identified above would reduce potential hazards/public safety impacts involving the removal and relocation of the above-ground storage tanks and involving threats due to fire to below a level of significance.

The recommendations provided in the FPP have been designed specifically for the proposed construction of structures adjacent the Wildland Urban Interface zone at the Salvation Army Divisional Camp project site. The project site's fire protection system includes a redundant layering of protection features that have been shown through post-fire damage assessments to reduce risk. For wildfire emergencies, the first and preferred alternative will be relocation from the site. This will be accomplished by high-capacity buses that will be stationed onsite at all times campers are present. Relocation will be the first alternative for Salvation Army but will be implemented through camp administrator's consultation with RMWD or other fire officials to minimize the likelihood that campers or staff would be exposed to high risk during the relocation process.

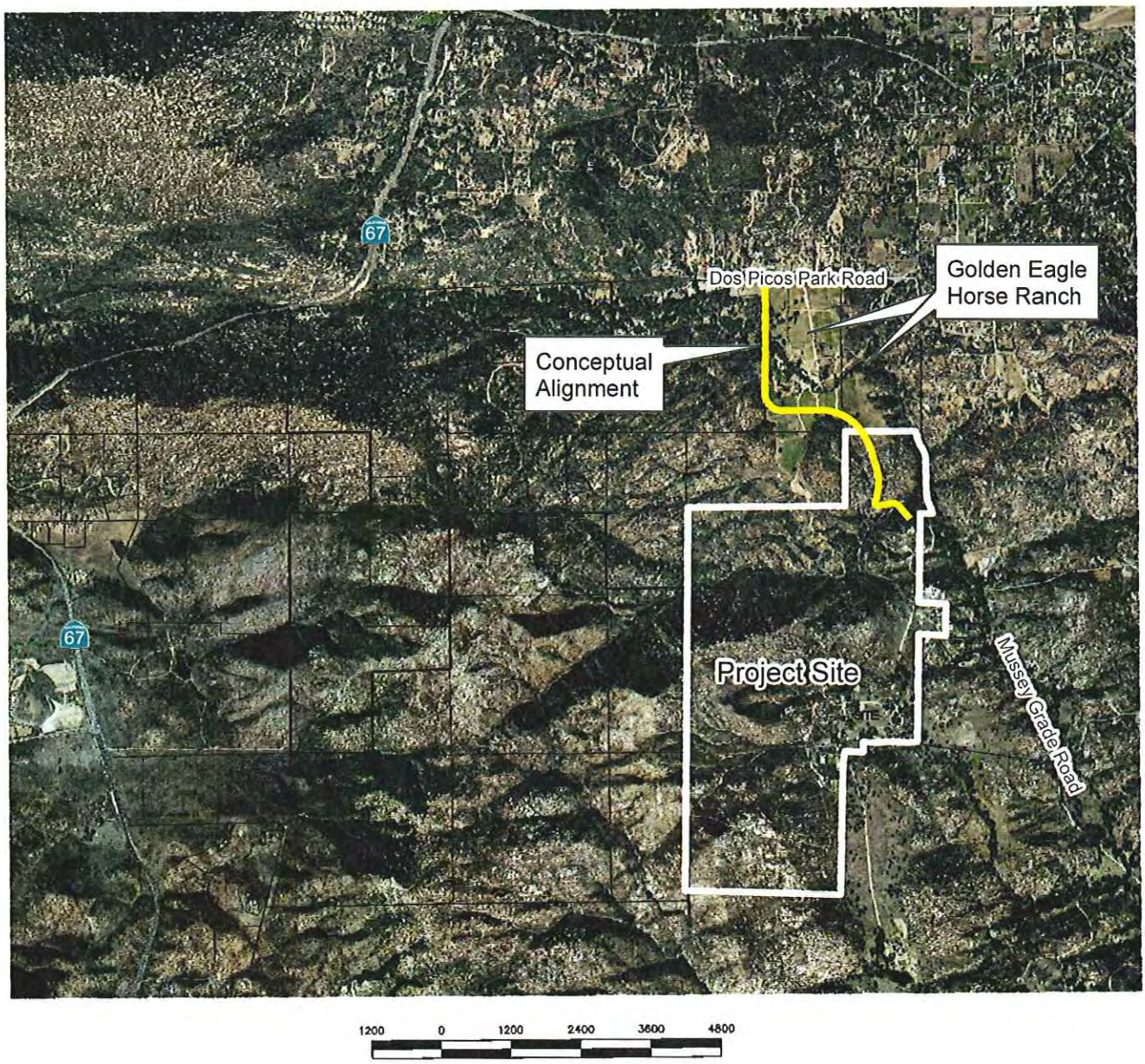
When relocation is not feasible, shelter-in-place will be the alternative. All structures on the site will be constructed to the latest codes, including ignition-resistant exterior walls, roofs, eaves, and vents and interior sprinklers. Older structures will be made safer with specific upgrades, such as vent protection and sprinklers. One structure in particular will be designated the site's shelter-in-place facility: a 19,500-square-foot multipurpose building will be provided additional ignition-resistant features, communications capabilities, and fuel modification (from six to 20 times as wide as the predicted flame length heights) and would accommodate up to 1,300 persons. Because this SIP structure would accommodate a substantially higher number of people than are expected onsite at any given time, it would be available to shelter local residents who may need refuge from advancing wildfire. There are also two large open air areas of modified fuels that would be available to emergency first responders such as helicopters, staging areas, or other discretionary uses.

Fuel modification would occur throughout the site and would be at minimum 100 feet wide and range to over 600 feet wide. Portions of the development area that are exposed to the western foothills, where the highest intensity fire and highest flame lengths were modeled to occur, would be provided 175 feet of fuel-modified defensible space (nearly four times the predicted flame lengths) to set back the structures from the modeled 45-foot-tall flame lengths. The fuel modification zone will be maintained and inspected annually, removing all dead and dying materials and maintaining appropriate horizontal and vertical spacing. In addition, plants that establish or are introduced to the fuel modification zone that are not on the approved plant list will be removed.

The development is designed with the required road improvements (width, paving, etc.) to provide access for emergency personnel. Water availability and flow would be improved with additional fire hydrants throughout the Camp and the 260,000-gallon water tank fed by the Ramona Municipal Water District.

Ultimately, it is the intent of the FPP to have structures that are defensible from wildfire and, in turn, would not represent a significant threat to ignite adjacent native habitat. Implementation of the required

enhanced construction features and the fuel modification requirements provided in the FPP will accomplish the goal of reducing the risk associated with this project's location in an area prone to wildfires.



SOURCE: SanGIS, 2007 and Nasland Engineering, 2008

01/07/08

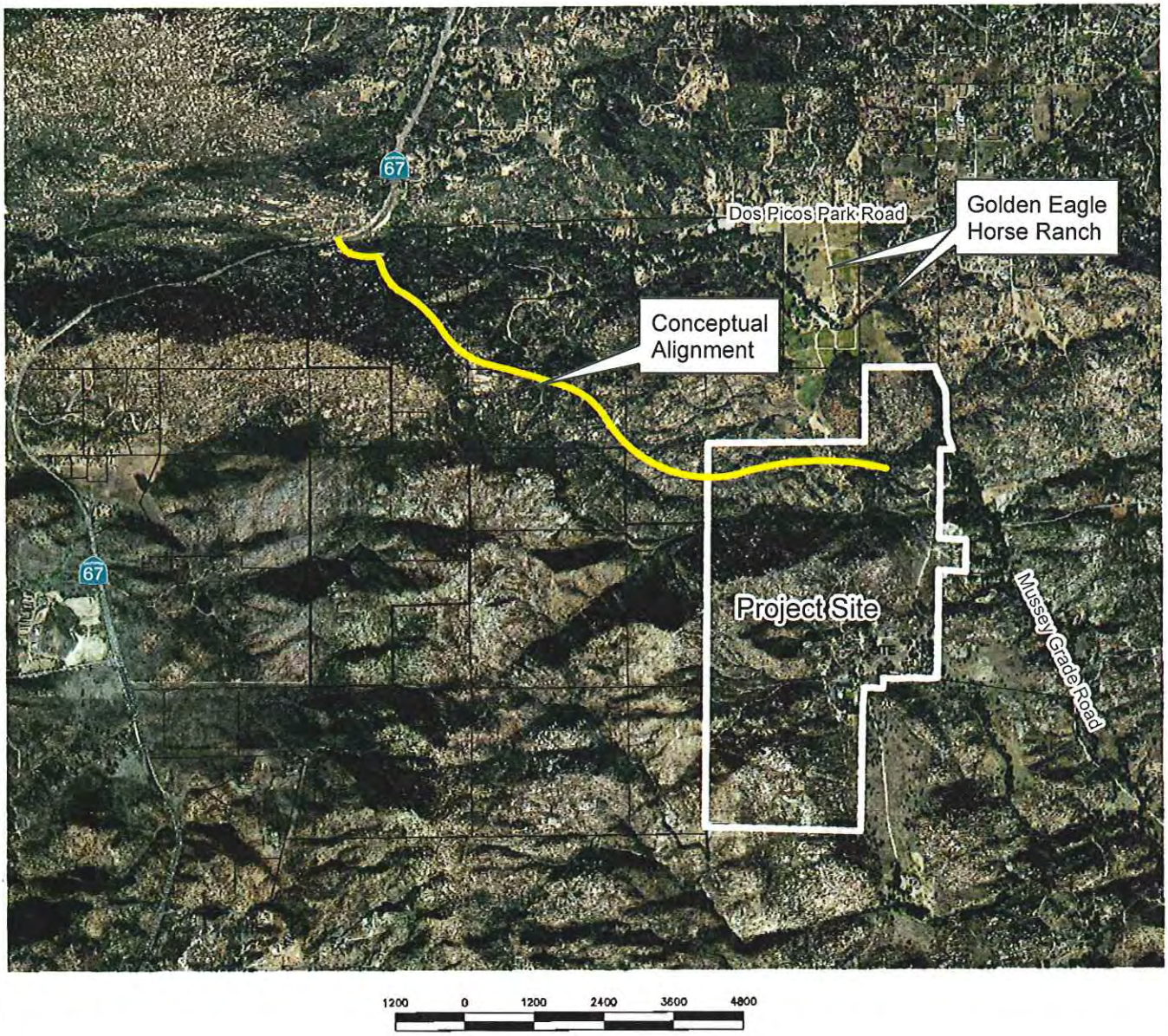
BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Northerly Route to Dos Picos Park Road - Secondary Access Conceptual Alignment

FIGURE 2.3-1

F:\projects\920_salvation_army\maps\GIS\fig 2.3-1 secondary access.mxd



SOURCE: SanGIS, 2007 and Nasland Engineering, 2008

01/07/08

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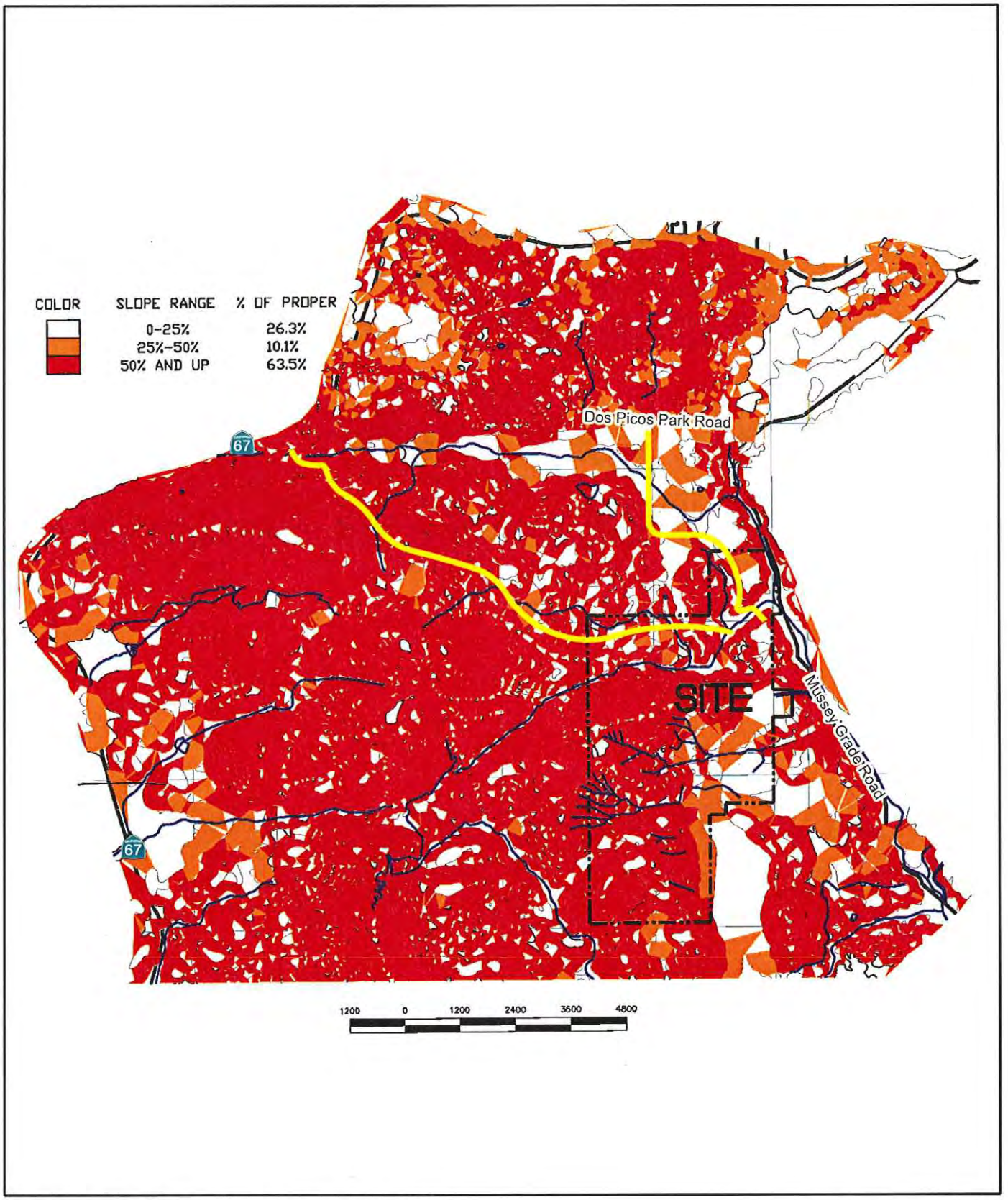
Salvation Army Divisional Camp and Retreat

Northwesterly Route to SR-67 - Secondary Access Conceptual Alignment

FIGURE 2.3-2

F:\projects\920_salvation_army\maps\GIS\fig 2.3-2 secondary access rte 67.mxd



SOURCE: SanGIS, 2007 and Nasland Engineering, 2008

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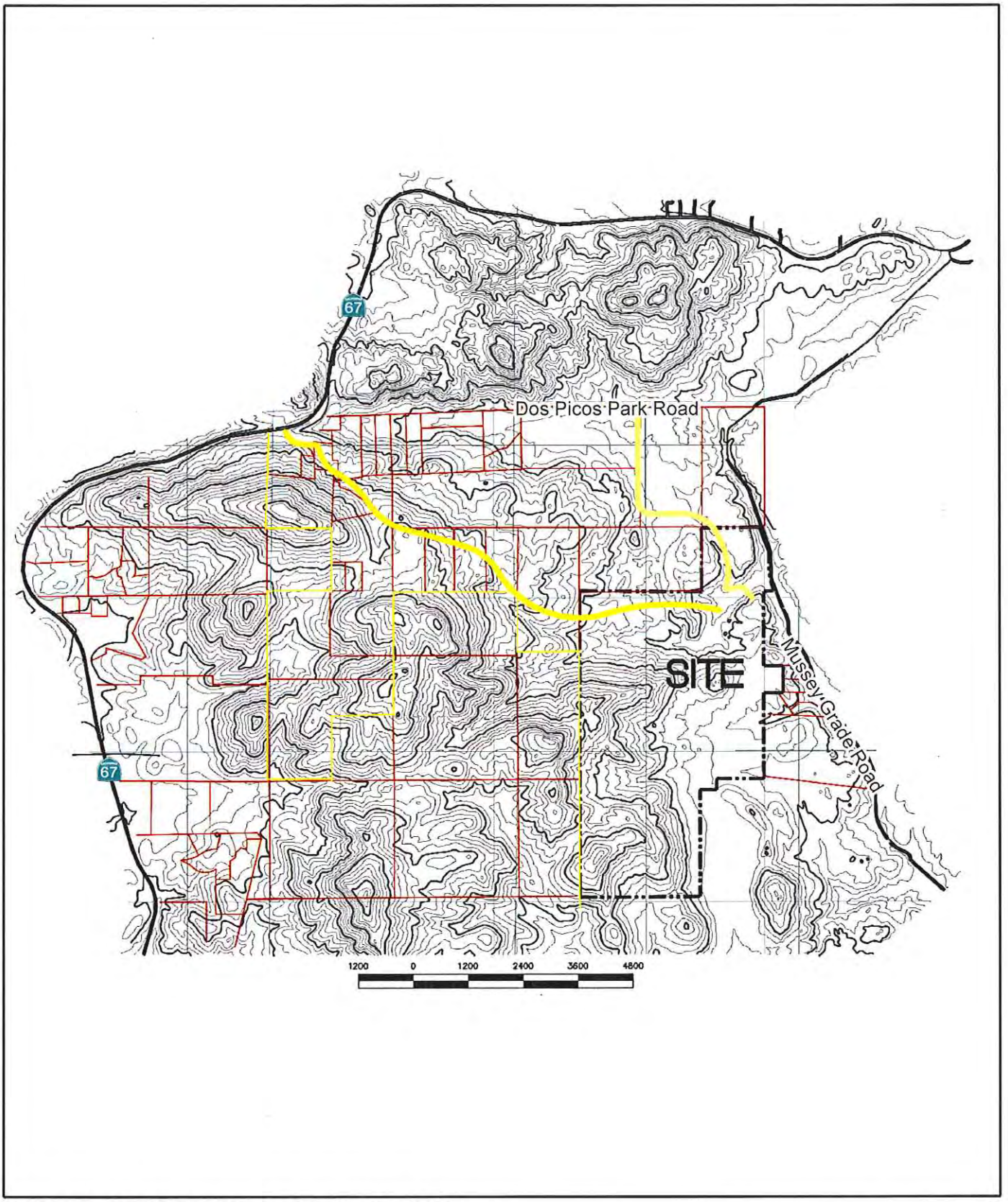
Salvation Army Divisional Camp and Retreat

Steep Slopes and Blue Line Streams

FIGURE 2.3-3

F:\projects\920_salvation_army\maps\GIS\fig 2.3-3 Slopes and blue line.mxd



SOURCE: SanGIS, 2007 and Nasland Engineering, 2008

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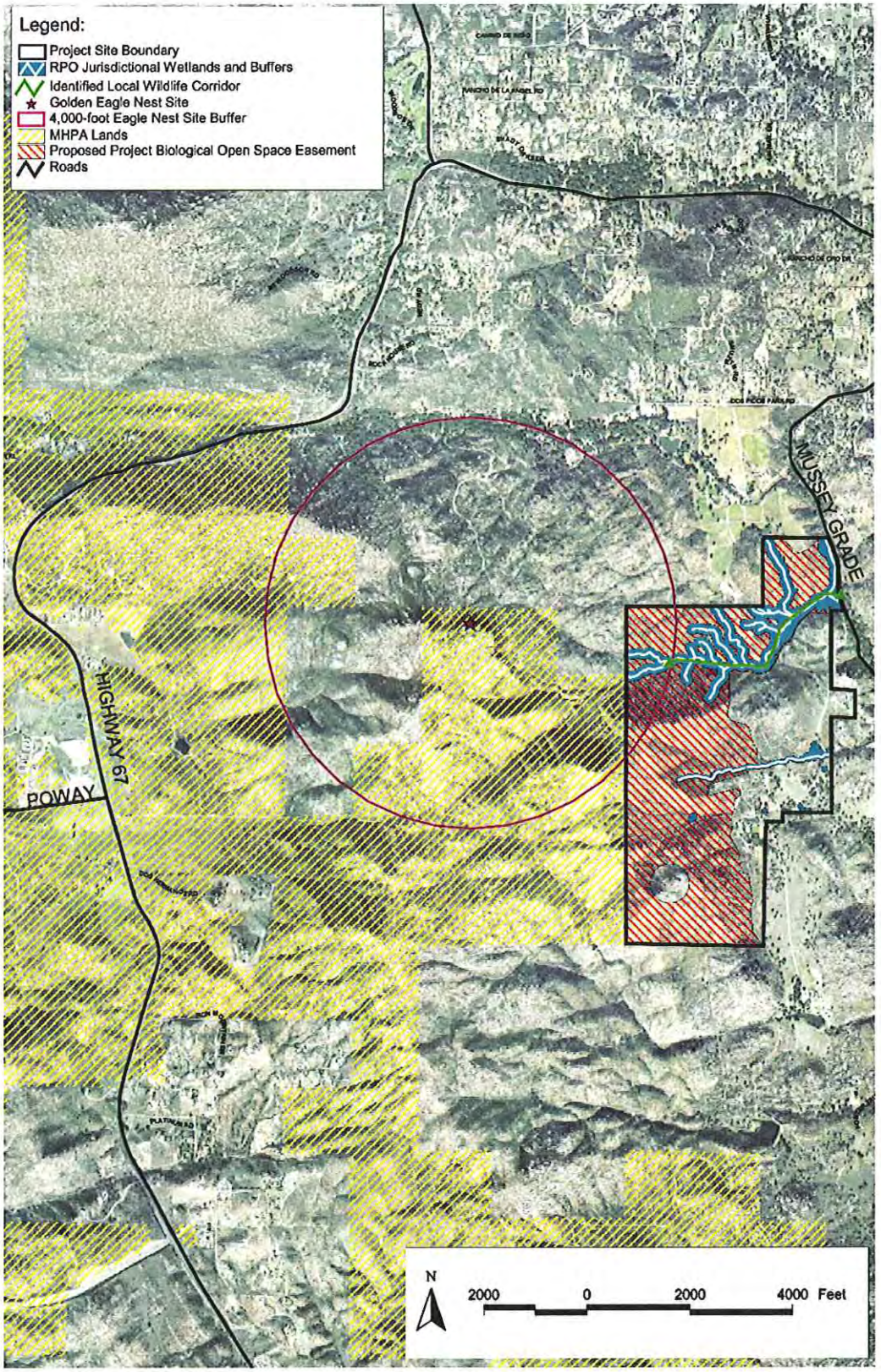
Salvation Army Divisional Camp and Retreat

Ownership

FIGURE

2.3-4

F:\projects\920_salvation_army\maps\GIS\fig 2.3-4 Ownership.mxd



SOURCE: SanGIS, 2007 and Merkel & Assoc., 2008

01/07/08

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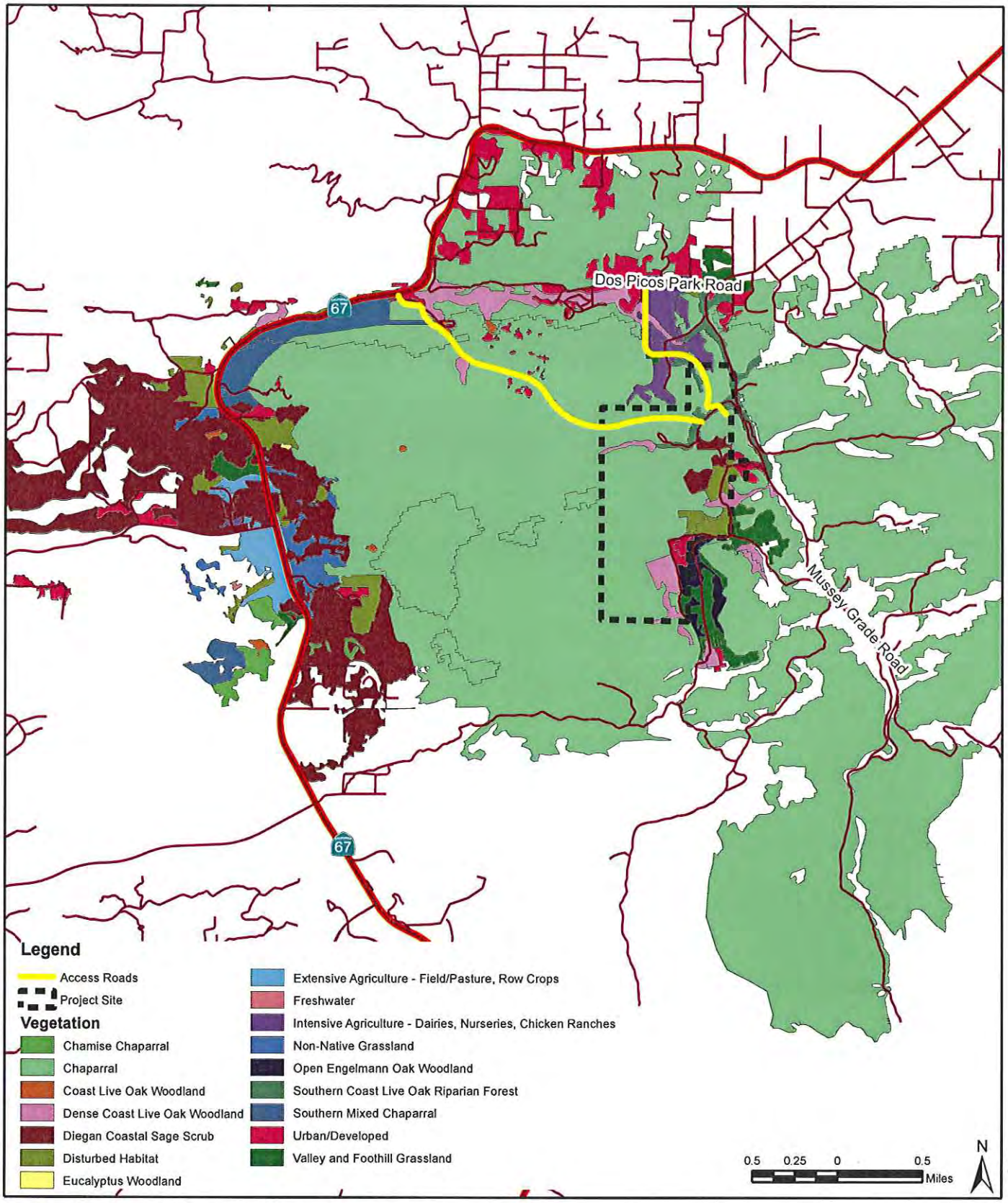
Salvation Army Divisional Camp and Retreat

Biological Constraints

FIGURE 2.3-5

F:\projects\920_salvation_army\maps\GIS\fig 2.3-5 Bio Constraints.mxd



SOURCE: SanGIS, 2007 and BRG Consulting Inc., 2008

01/07/08

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Salvation Army Divisional Camp and Retreat

Vegetation Communities

FIGURE 2.3-6

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2.4 Noise

No changes to this section have been made since the February 2005 Draft EIR. Therefore, this section is not provided in this Revised Draft EIR.

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2.5 Aesthetics

No changes to this section have been made since the February 2005 Draft EIR. Therefore, this section is not provided in this Revised Draft EIR.

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2.6 Cultural Resources

No changes to this section have been made since the February 2005 Draft EIR. Therefore, this section is not provided in this Revised Draft EIR.

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2.7 Land Use/Planning

An errata to *Section 2.7 Land Use/Planning* has been provided that incorporates reference to the Fire Protection Plan into the description of the project's consistency with Goal I of the Open Space Element and Public Safety Element goal of the County General Plan; Policy/Recommendation 18 of the Community Character Element, and the Open Space goal of the Ramona Community Plan.

ERRATA to EIR CHAPTER 2.7 LAND USE/PLANNING:

(Page 2.7-6)
Open Space Element

Agricultural Preserves and Open Space Easements and Open Space and Design of Private Lands

Goal I: Health and Safety

> *"Protect life and property by regulating use of areas subject to flooding, landslides, high fire hazard and high earthquake potential."*

As previously discussed, the project area is not located in a flood-prone area. Proposed development would be generally located on the flatter developed portions of the site and therefore would not encourage erosion and potential landslides. ~~Fire protection measures such as fire setbacks and installation of sprinkler systems, and the provision of emerging fire fighting water flow and capacity, have been incorporated into the proposed project in order to prevent losses due to fire.~~ The Fire Protection Plan (FPP) for the project site includes a redundant layering of protection methods that have been proven to reduce risk. The combined fire protection system designed for structures on this site includes, but is not limited to, customized fuel modification zones with a minimum two times and up to 20 times the width of predicted flame length heights; enhanced, ignition-resistive construction; interior sprinklers; and infrastructural improvements only possible with the implementation of the site plans proposed in Alternatives I and II. In addition, the FPP requires water availability and flow would be improved with additional fire hydrants and water pipeline upgrades throughout the Camp, and a 260,000-gallon water tank fed by the Ramona Municipal Water District. The 260,000-gallon water tank would be placed near the existing 10,000-gallon water tank, which will remain in service. The Camp will also be considered a "shelter-in-place" facility, which means that when relocation of campers is not feasible, a designated area of the Camp will be used to accommodate people on site during a wildfire emergency. This fire protection system is designed to drastically reduce the wildlife risk on the project site and to provide a safe area for sheltering during the wildfire, if necessary. The project site is not located in an Alquist-Priolo Special Studies Zone, or an area with a high earthquake risk (Jennings, 1994). By focusing development on lands not prone to flooding and earthquakes, by limiting intrusion on steep slopes to prevent landslide risk, and by incorporating fire safety elements into the plan, the proposed project contributes to the health and safety goal to protect life and property by regulating use of areas subject to flooding, landslides, high fire hazard and high earthquake potential.

(Page 2.7-9)
Public Safety Element

Goal: "Minimize injury, loss of life and damage to property resulting from fire, geologic or crime occurrence."

The project area is a rural setting and supports large areas of flammable native and non-native vegetation. A Fire Protection Plan (FPP) has been prepared for the Salvation Army Divisional Camp and Retreat, based on the site layout described in Alternative I. The purpose of the FPP is to generate and memorialize fire safety requirements that will provide a reduced level of risk for the Camp and its visitors. The FPP identifies the fire risk associated with the proposed expansion land uses (as identified in MUP P70-379W2) and identifies requirements for water supply, fuel modification, access, building ignition and fire resistance, fire protection systems, defensible space, and vegetation management, among other pertinent criteria for fire protection. ~~Proposed development would comply with the Ramona Fire Department conditions to reduce hazards and public safety impacts related to potential fires in the project area as a condition of approval of the MUP. Such measures would include, but would not be limited to: 1) providing a 100-foot cleared brush management zone around all habitable structures; 2) providing a water system capable of providing the required fire flow requirements; and, 3) providing automatic sprinklers for all existing new buildings per Ramona Fire Code Ordinance 99-199.~~

The campground has an existing Evacuation and Fire Safety Plan ~~Disaster Plan, or Emergency Evacuation Plan,~~ in place that has been reviewed by the Ramona Fire Department. ~~substation of the Sheriff's Department. This Disaster Plan~~ The Plan includes instructions for campers and staff, including initial steps that must be followed; evacuation procedures; fire prevention policies and procedures; and emergency transportation guidelines.: ~~1) use of electronic communication devices ("walkie-talkies") to communicate emergency information among staff; 2) continuous honking of horns and use of megaphones in the event of an emergency; 3) assemble on existing play fields; 4) counselors standing with campers and verifying that all assigned campers are accounted for; 5) designated staff members will look for any missing campers; and, 5) w ait for further instructions from emergency personnel. There are three access roads on-site that lead to Mussey Grade Road and can be used during an emergency evacuation, they are: 1) the main access road; 2) access through Wildwood Ranch on the eastern boundary of the project site; and, 3) emergency access through a small residential parcel owned by the Salvation Army (not a part of the project area) located behind existing staff housing, on the eastern boundary of the project site.~~

The effectiveness of the Salvation Army's Disaster Plan, the predecessor to the Fire Protection Plan, was demonstrated during the October 2003 fire disaster. Two groups had contracted use of the site when the fire struck the property. The Salvation Army had begun their procedures to self evacuate the site when the Sheriff arrived at 7:20 a.m. on October 26th to request the camp be evacuated. The Salvation Army's Disaster Plan procedures were followed and no injuries or loss of life occurred. However, several structures were burned including three staff residences, one activity building, two camp cabins, one infirmary, one maintenance shed along with vehicles and equipment, and one tent/platform.

As described previously, potential seismic impacts would be mitigated to below a level of significance with proper engineering design of all structures, per the Uniform Building Code as adopted by the County of San Diego.

It is not anticipated that the proposed project would result in an increase in crime in the area. Operations at the existing camp has not resulted in any police call to date and staff to camper ratios will be relatively high, with approximately one staff member for every three campers, which will serve to minimize disorder and potential crime by camp attendees. Additionally, the remote nature of the area and the inaccessibility of transportation to campers would serve to prevent crime problems at or near the project site.

Through fire mitigation design guidelines and a coordinated emergency plan; designing buildings in accordance with the Uniform Building Code and continuing operations of a camp facility with no record of crime problems, the proposed project would be consistent with the Public Safety Element goal to minimize injury, loss of life and damage to property resulting from fire, geologic or crime occurrence.

(Page 2.7-15)
Community Character

18. *"Open space easements shall be placed on all significant stands of oak and steep slopes."*

The proposed project has been designed to minimize impacts to sensitive habitat, including oak woodlands and riparian forests. The project proposes designation of a ~~109~~278.80-acre biological open space easement, which includes significant stands of oak and steep slopes. Therefore, the proposed project is consistent with this Community Character policy.

(Page 2.7-16)
Open Space

Goal: *"Encourage a pattern of open space lands for the preservation of natural resources, for resource production, for outdoor recreational uses, and for public health and safety."*

By incorporating an open space easement of ~~109~~ 278.80 acres into the design, the proposed project is consistent with the goal to encourage a pattern of open space lands for the preservation of natural resources.

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3.0 CUMULATIVE IMPACTS

Section 3.0 Cumulative Impacts has been revised to incorporate reference to the Fire Protection Plan into the cumulative Hazards and Hazardous Materials discussion.

ERRATA to EIR CHAPTER 3.0 CUMULATIVE IMPACTS:

(Page 3-4)

3.1.3 Hazards and Hazardous Materials

For purposes of the cumulative hazards and hazardous materials analysis, the cumulative study area includes the Ramona community. As discussed in EIR Section 2.3, implementation of the proposed project would result in direct hazards and hazardous materials from removal of an above-ground fuel storage tank and an increase in the number of people exposed to potential wildland fire hazards. Like the proposed project, all new development would be required to comply with the County Uniform Building Code, the Fire Code, and requirements of the Ramona Fire Department and the California Department of Forestry. A Fire Protection Plan (FPP) has been prepared for the project site in order to generate and memorialize fire safety requirements that will provide a reduced level of risk for the Camp and its visitors. The combined fire protection system detailed in the FPP is designed to drastically reduce the wildfire risk on the site and to provide a safe area for sheltering during a wildfire, if necessary. The FPP incorporates the latest building and fire code protection components that have been identified and codified from statewide post-fire damage assessments. Therefore, hazards and hazardous materials impacts would not be cumulatively considerable.

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4.0 PROJECT ALTERNATIVES

Section 4.0 Project Alternatives has been revised to incorporate biological resources and hazards and hazardous materials impacts as a result of the amended Resource Protection Ordinance and the new Fire Protection Plan.

ERRATA to EIR CHAPTER 4.0 PROJECT ALTERNATIVES:

4.3 Analysis of the Reduced Project Alternative I (Page 4-5)

4.3.2.2 Biological Resources

With the application of the Fire Protection Plan that mandated an increased fire management zone, some habitat impacts have increased from those assessed under the 2005 Draft EIR. The following habitat impact increased have been noted under the Alternative I Plan: 0.29 acre of Disturbed Habitat, 0.11 acre of Diegan Coastal Sage Scrub, 3.85 acres of Southern Mixed Chaparral, and 1.11 acres of Coast Life Oak Woodland. The increased impacts to disturbed areas are not significant. Increases in Diegan Coastal Sage Scrub (<1%), Southern mixed chaparral (12% under Alternative I), and Coast live oak woodland (16%) are minor relative to the total projects. These increases do not change the degree of habitat impact significance and all impacts would still be mitigated to a level below significant through on-site habitat preservation and management. Reduced Project Alternative I would considerably reduce the disturbance of natural vegetation and sensitive species within the project site (Figures 4-2~~3~~3a – 4-3k ~~and 4-3~~) as compared to the proposed project (without accounting for expanded fire modification requirements that would be required for the proposed project as well). Specifically, this alternative would reduce impacts to native vegetation communities by ~~approximately nine~~ nearly three acres (i.e., a ~~nine~~ nearly three percent reduction) (Tables 4-1 and 4-2). Implementation of Reduced Project Alternative I would result in the loss of six fewer Engelmann Oak trees than the proposed project. Impacts to Diegan Coastal Sage Scrub would be reduced by 0.83~~94~~ acres, (~~seven~~ over a six percent reduction) compared with the proposed project, and impacts to ~~Coast Live Oak Woodland and~~ Southern Coast Live Oak Riparian Forest would be reduced by ~~0.44 and~~ 0.64, ~~respectively~~ acres, (~~six and~~ 32 percent reduction) compared to the proposed project. Impacts to Southern Mixed Chaparral are shown as a slight increase; however, as with all of the vegetation impact comparisons, this does not account for any additional FPP fire clearing requirements that would be required for the proposed project. ~~would be reduced by 4.48 acres (12 percent reduction).~~ Impacts to Coastal Sage-Chaparral Scrub would be reduced by 1.08 acre (or 12 percent reduction). Impacts to RPO wetlands would be reduced by 0.01~~9~~ acre. Although these impacts would be reduced when compared to the proposed project, mitigation would still be required to reduce these impacts to below a level of significance.

Implementation of the Reduced Alternative I would eliminate the conflicts with the MSCP/BMO and RPO. Under this alternative, the Retreat Center would be relocated to the south, and the relocation would reduce impacts to sensitive biological resources (described in EIR Section 2.2).

4.3.2.3 Hazards And Hazardous Materials

Reduced Project Alternative I, like the proposed project, would also result in the same potential Hazards and Hazardous Materials impacts. However, with a reduced site capacity, implementation of the Reduced Project Alternative I would incrementally reduce hazards impacts from potential wildland fires and seismic events. Regardless, implementation of the same mitigation proposed for the project would also reduce Hazards and Hazardous Materials impacts for Reduced Project Alternative I to below a level of significance. In addition, the Fire Protection Plan (FPP) is based on the site plan in Alternative I. Implementation of the requirements of the FPP would reduce the hazards associated with wildfires to below a level of significance.

4.4 Analysis of the Reduced Project Alternative II (Page 4-7)

4.4.2.2 Biological Resources

With application of the FPP that mandated an increased fire management zone, some habitat impacts have increased from those assessed under the 2005 Draft EIR. Under the Alternative II Plan, the following impact increases have been noted: 0.29 acre of Disturbed Habitat, 0.11 acre of Diegan Coastal age Scrub, 4.82 acres of Southern Mixed Chaparral, and 1.11 acres of Coast Live Oak Woodland. The increased impacts to Disturbed areas are not significant. Increases in Diegan Coastal Sage Scrub (<1%), Southern Mixed Chaparral (15% under Alternative II), and Coast Live Oak Woodland (16%) are minor relative to the total impacts. These increases do not change the degree of habitat impact significance and all impacts would still be mitigated to a level below significant through on-site habitat preservation and management. Like Reduced Project Alternative I, Reduced Project Alternative II would reduce the disturbance of natural vegetation and sensitive species within the project site (Figures 4-4a – 4-4k~~4-5 and 4-6~~) even without accounting for the additional vegetation clearing that would be requred for the proposed project as a result of expanded fuel modification zones. Implementation of Reduced Project Alternative II would result in the same reduction in disturbance of natural vegetation and sensitive species as the Reduced Project Alternative I ~~with the exception of Southern Mixed Chaparral. Reduced Project Alternative II would further reduce impacts to Southern Mixed Chaparral by 0.97 acre (a 21 percent decrease from the Reduced Project Alternative I acreage)~~ (Tables 4-1 and 4-2).

Implementation of the Reduced Alternative II would eliminate the conflict with the MSCP/BMO and RPO for the same reasons that Reduced Alternative I would eliminate the conflict.

4.4.2.3 Hazards And Hazardous Materials

Reduced Project Alternative II, like the proposed project and Reduced Project Alternative I, would also result in the same potential Hazards and Hazardous Materials impacts. However, with a reduced site capacity, implementation of the Reduced Project Alternative II would incrementally reduce hazards impacts from potential wildland fires and seismic events. Regardless, implementation of the same mitigation proposed for the project would also reduce Hazards and Hazardous Materials impacts for Reduced Project Alternative II to below a level of significance. In addition, the FPP is based on the site plan in Alternative I. The site plan for Alternative II is similar to that of Alternative I, but includes fewer buildings. Implementation of the requirements of the FPP would reduce the hazards associated with wildfires to below a level of significance.

01/15/08

Source : Merkell and Assoc, 2006

BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative I

FIGURE 4-3a

Source : Merkell and Assoc, 2006

01/15/08

BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative I

FIGURE 4-3b

Source : Merkell and Assoc, 2006

01/15/08

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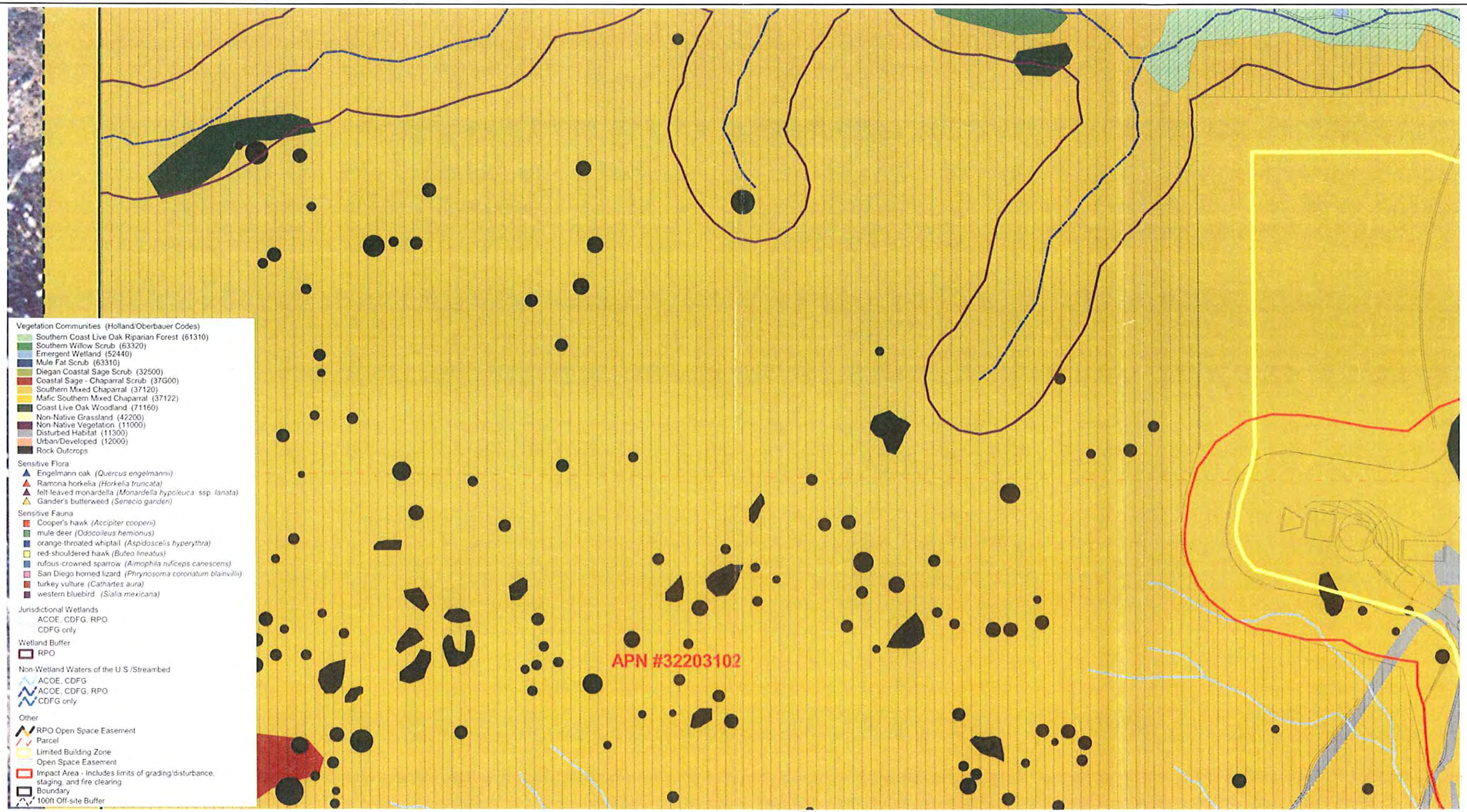
Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative I

FIGURE 4-3c



Source : Merkell and Assoc, 2006

01/15/08

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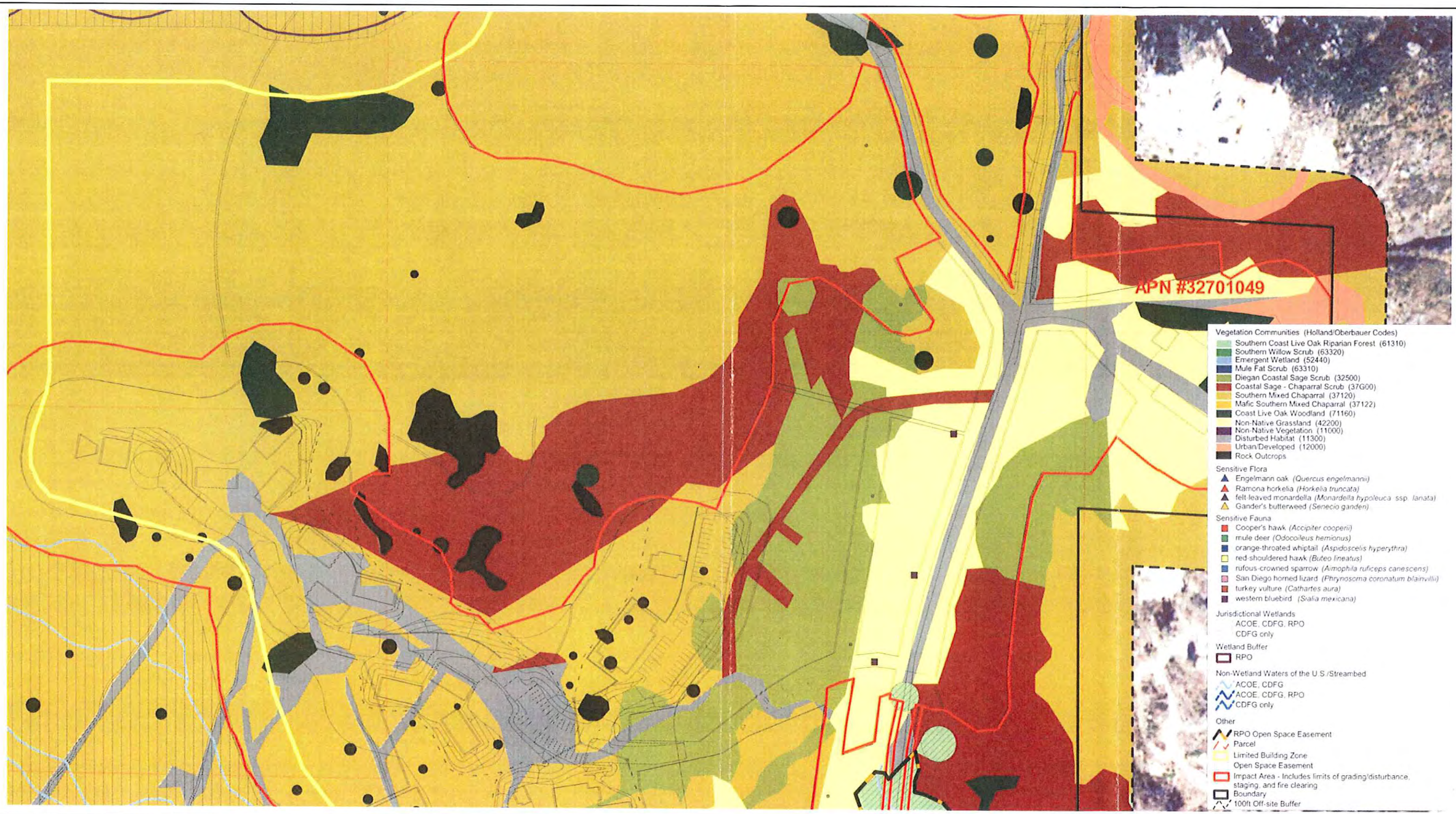
Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative I

FIGURE 4-3d



Source : Merkell and Assoc, 2006

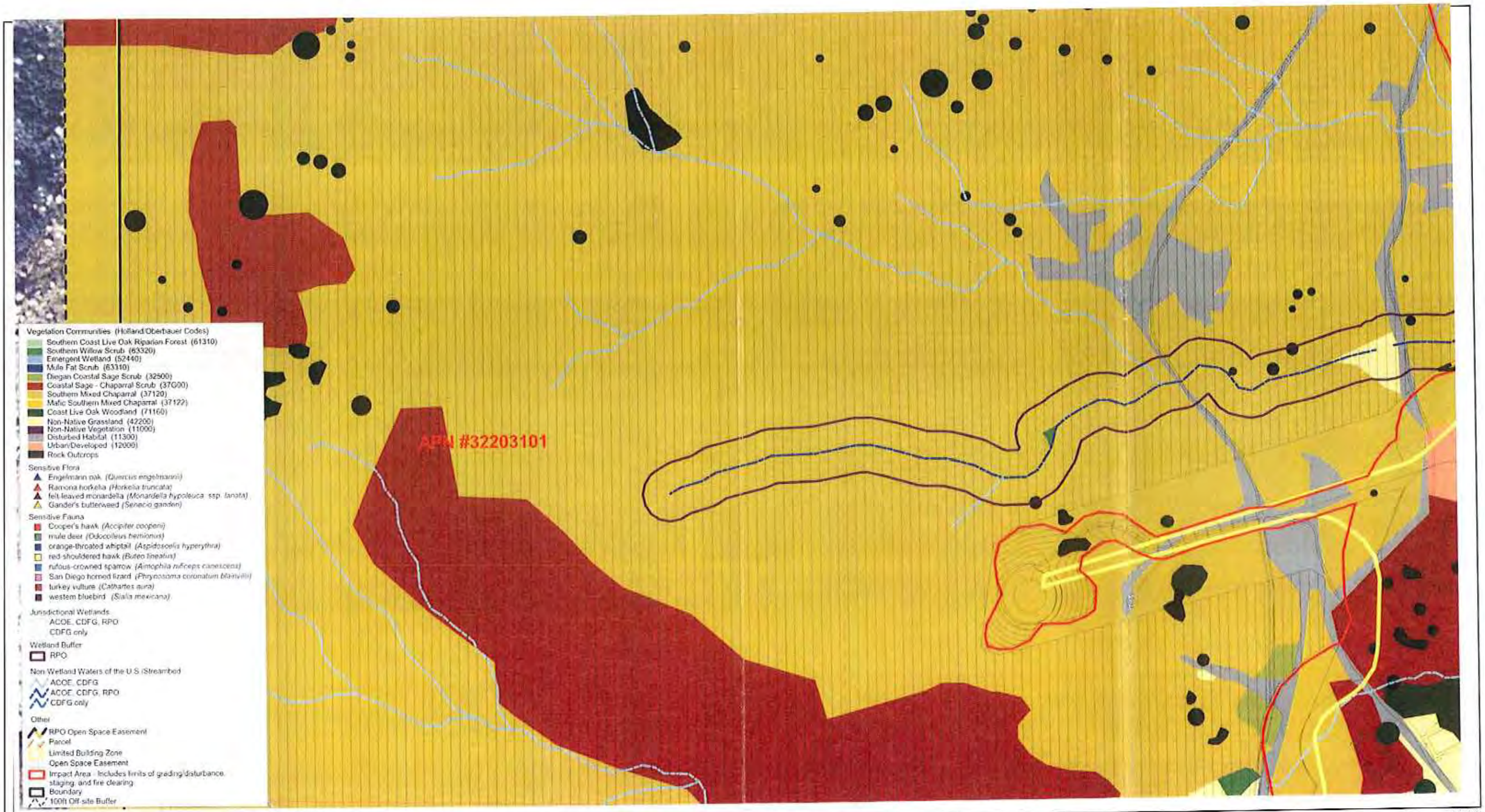
01/15/08

BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative I

FIGURE 4-3e



01/15/08

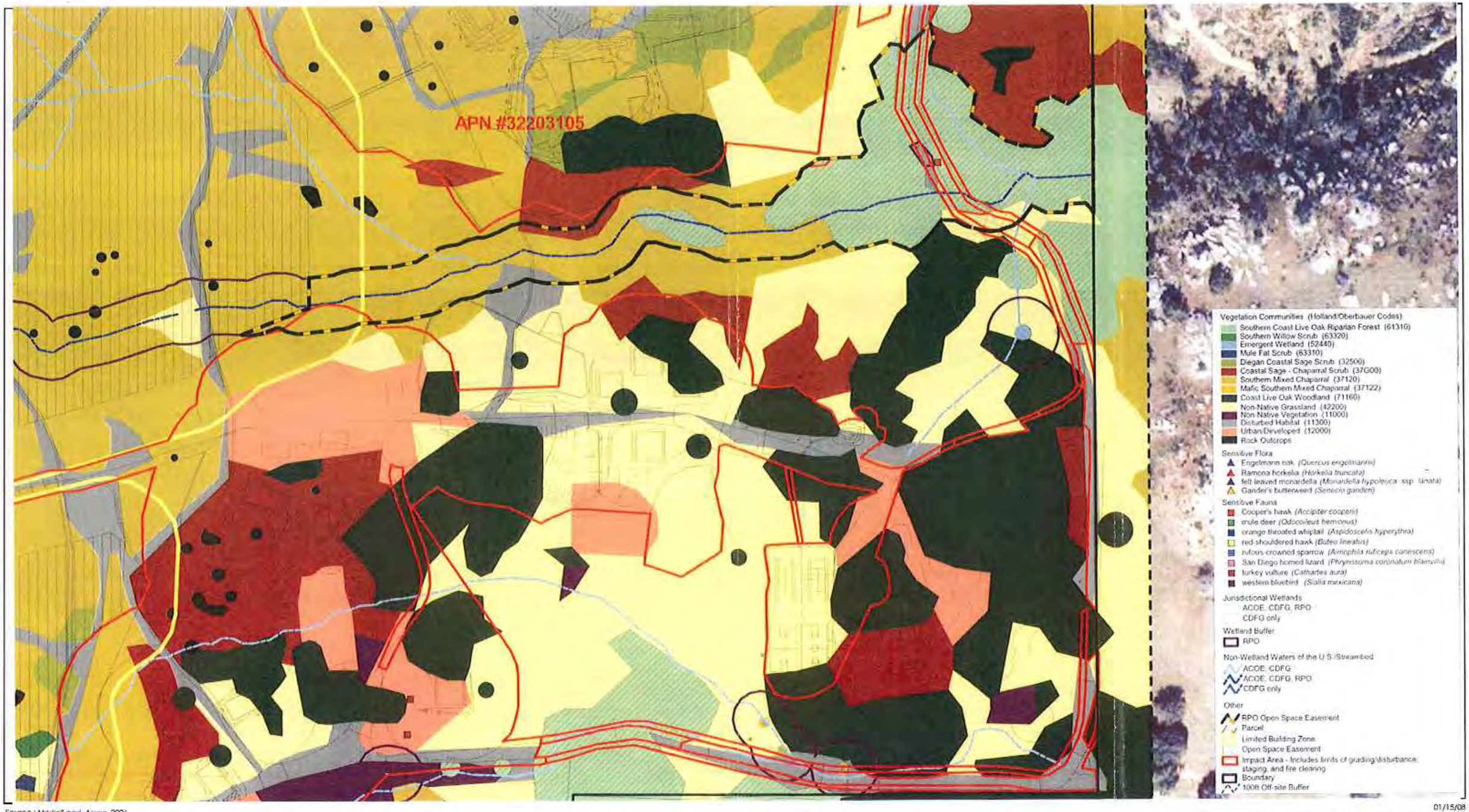
Sources : Merkell and Assoc, 2006

BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative I

FIGURE 4-3f



Source : Merkel and Assoc, 2006

01/15/08

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Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative I

FIGURE 4-3g

Source : Merkell and Assoc, 2006

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Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative I

FIGURE 4-3h

Source : Merkell and Assoc, 2006

01/15/08

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Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative I

FIGURE 4-3i

Source : Merkell and Assoc., 2006

01/15/08

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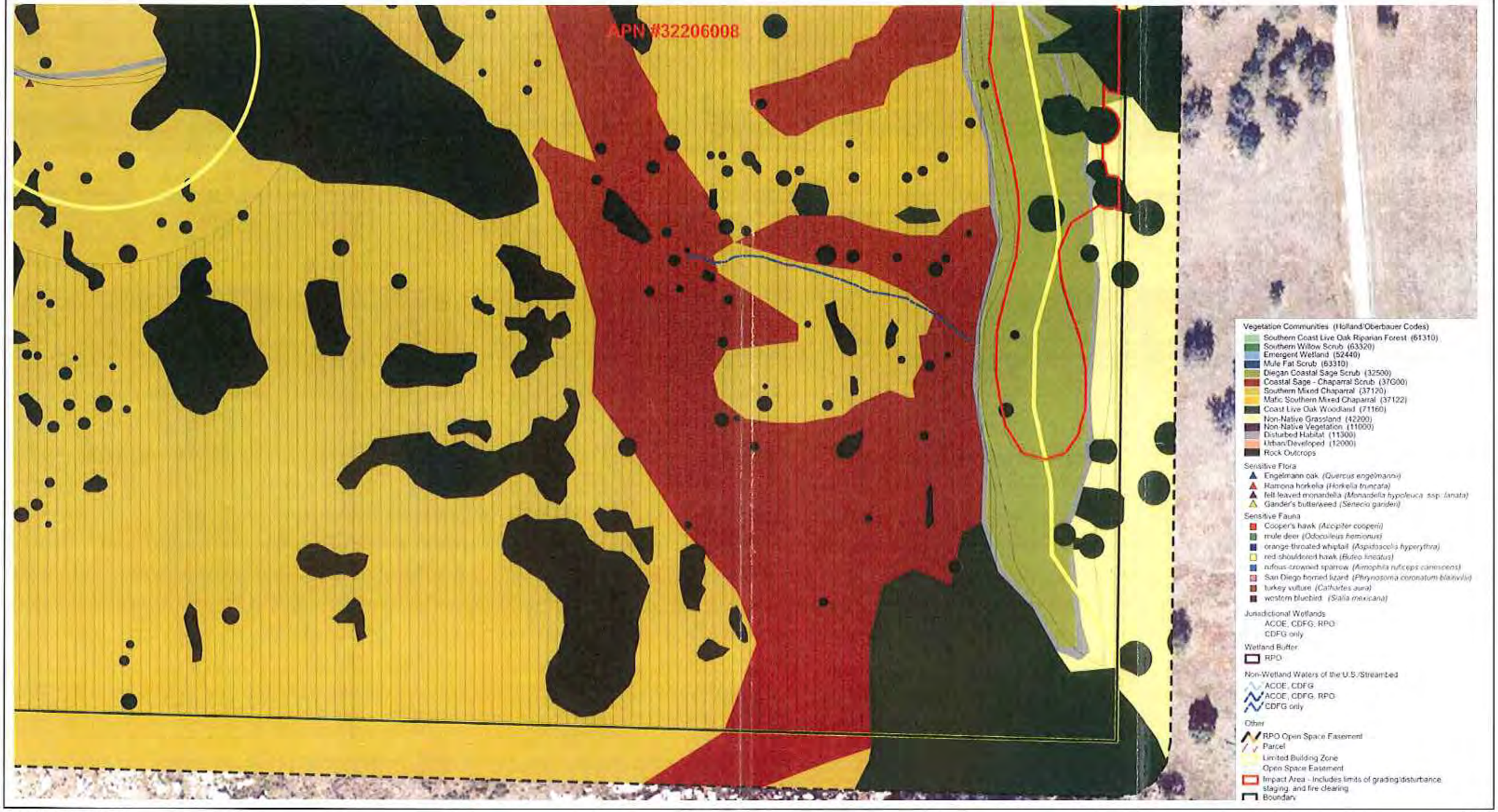
Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative I

FIGURE 4-3j



Source : Merkell and Assoc, 2006

01/15/08

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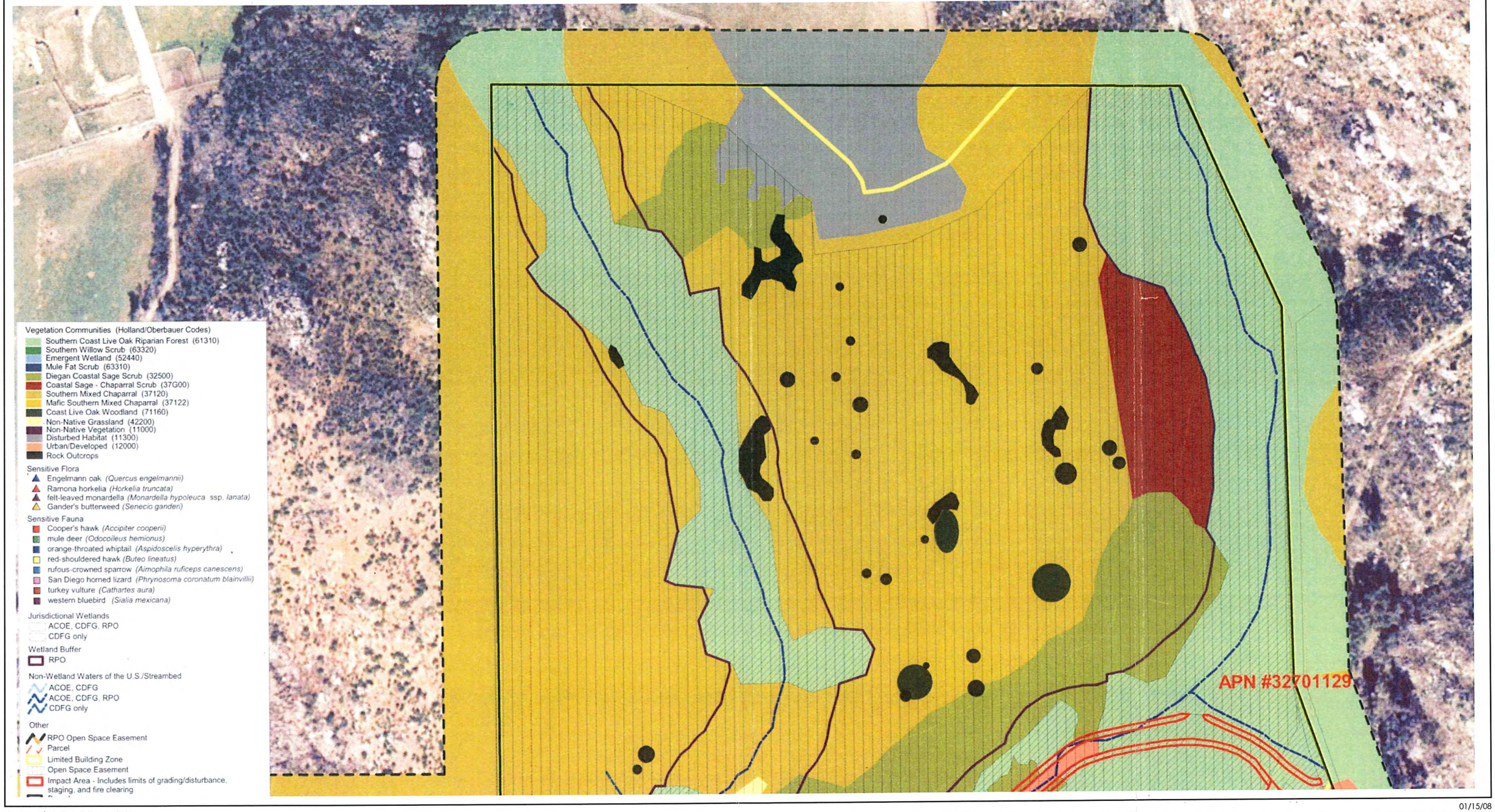
Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative I

FIGURE 4-3k



01/15/08

Source : Merkell and Assoc, 2006

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Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative II

FIGURE 4-4a

01/15/08

Source : Merkell and Assoc, 2006

BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative II

FIGURE 4-4b

Source : Merkell and Assoc, 2006

01/15/08

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Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative II

FIGURE 4-4c

Source : Merkell and Assoc, 2006

01/15/08

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Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative II

FIGURE 4-4d

Source : Merkell and Assoc, 2006

01/15/08

BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative II

FIGURE 4-4e

Source : Merkell and Assoc, 2006

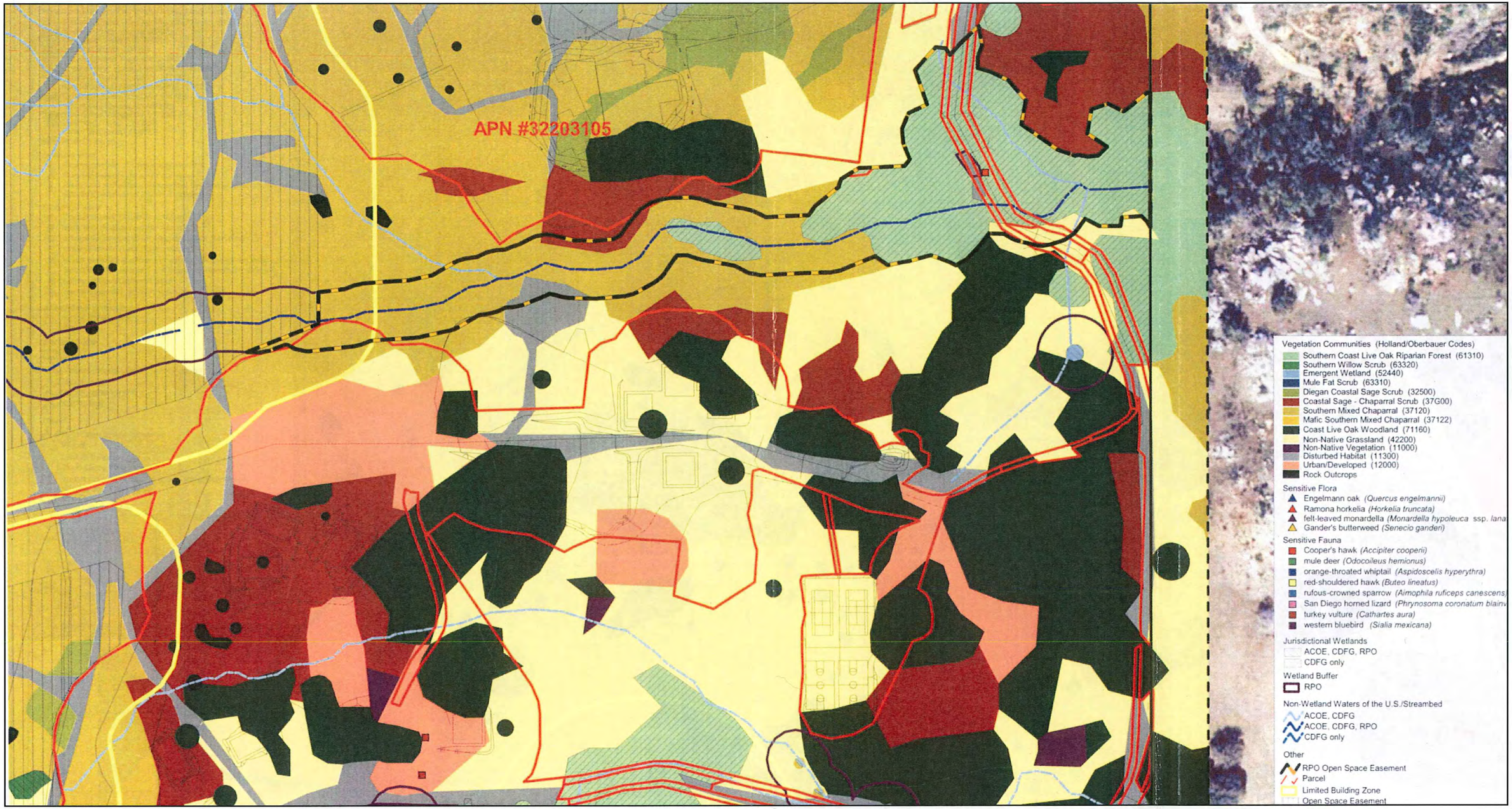
01/15/08

BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative II

FIGURE 4-4f



Source : Merkell and Assoc, 2006

01/15/08

BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative II

FIGURE 4-4g

01/15/08

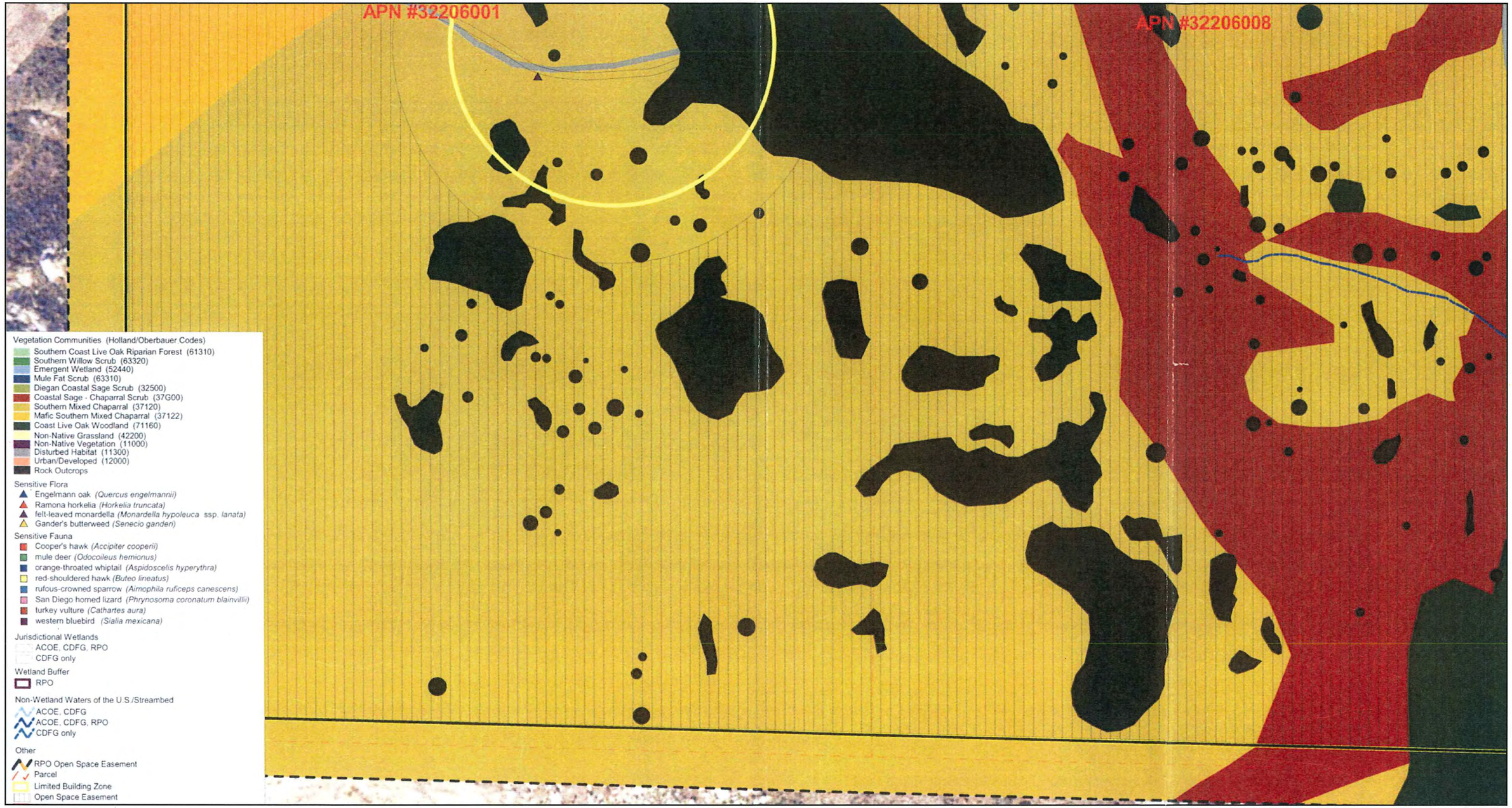
Source : Merkell and Assoc, 2006

BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative II

FIGURE 4-4i



Source : Merkell and Assoc, 2006

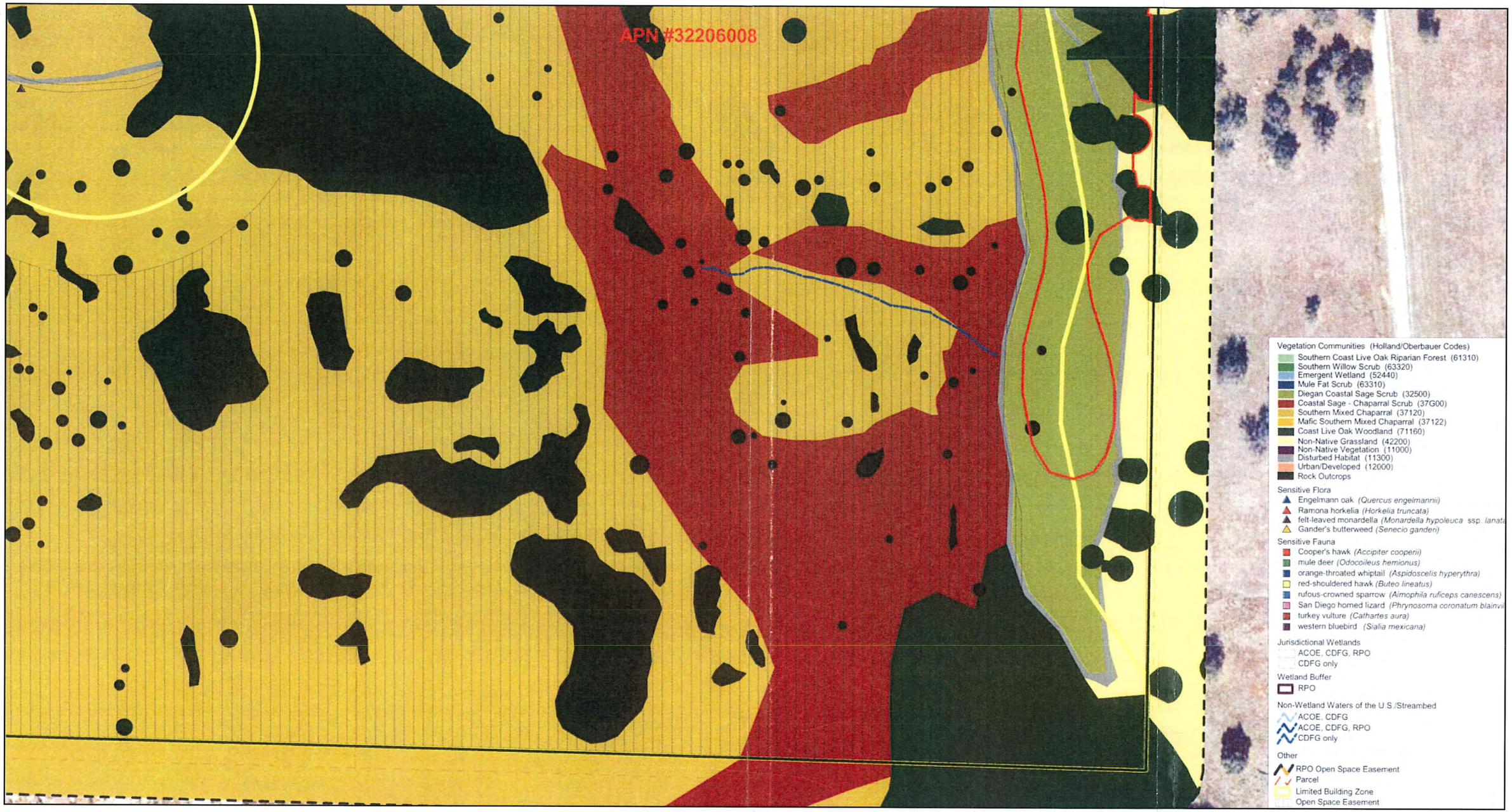
01/15/08

BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative II

FIGURE 4-4j



Source : Merkell and Assoc, 2006

01/15/08

BRG CONSULTING, INC.

Salvation Army Divisional Camp and Retreat

Biological Resouce Map - Alternative II

FIGURE 4-4k

TABLE 4-1
Project Alternatives Impact Comparison

BIOLOGICAL RESOURCES		
PROPOSED PROJECT[1]	REDUCED PROJECT ALTERNATIVE 1	REDUCED PROJECT ALTERNATIVE 2
Impact 2.2a: Significant/mitigated impact to 2.00 acres of Southern Coast Live Oak Riparian Forest.	Incrementally reduced: Significant/mitigated impact to 1.36 acres of Southern Coast Live Oak Riparian Forest.	Same as Reduced Alt. I: Significant/mitigated impact to 1.36 acres of Southern Coast Live Oak Riparian Forest.
Impact 2.2b: Significant/mitigated impact to 7.29 acres of Coast Live Oak Woodlands.	Incrementally reduced: Significant/mitigated impact to ~~6.85~~7.96 acres of Coast Live Oak Woodlands.	Same as Reduced Alt. I: Significant/mitigated impact to ~~6.85~~7.96 acres of Coast Live Oak Woodlands.
Impact 2.2c: Significant/mitigated impact to 0.14 acre of RPO wetlands.	Incrementally reduced: Significant/mitigated impact to ~~0.10~~0.03 acre of RPO wetlands.	Same as Reduced Alt. I: Significant/mitigated impact to ~~0.10~~0.03 acre of RPO wetlands.
Impact 2.2d: Significant/mitigated impact to 13.12 acres of Diegan Coastal Sage Scrub.	Incrementally reduced: Significant/mitigated impact to ~~12.18~~12.29 acres of Diegan Coastal Sage Scrub.	Same as Reduced Alt. I: Significant/mitigated impact to ~~12.18~~12.29 acres of Diegan Coastal Sage Scrub.
Impact 2.2e: Significant/mitigated impact to 9.26 acres of Coastal Sage-Chaparral Scrub.	Incrementally reduced: Significant/mitigated impact to 8.18 acres of Coastal Sage-Chaparral Scrub.	Same as Reduced Alt. I: Significant/mitigated impact to 8.18 acres of Coastal Sage-Chaparral Scrub.
Impact 2.2f: Significant/mitigated impact to 37.36 acres of Southern Mixed Chaparral.	Incrementally reduced: Significant/mitigated impact to ~~32.88~~36.73 acres of Southern Mixed Chaparral.	Incrementally reduced: Significant/mitigated impact to ~~31.91~~36.73 acres of Southern Mixed Chaparral.
Impact 2.2g: Significant/mitigated impact to ~~12.33~~ 12.45 acres of Non-native Grasslands.[2]	Incrementally reduced: Significant/mitigated impact to ~~11.93~~12.41 acres of Non-native Grasslands.[2]	Same as Reduced Alt. I: Significant/mitigated impact to ~~11.93~~12.41 acres of Non-native Grasslands.[2]
Impact 2.2h: Significant/mitigated impact to 38 Engelmann Oaks.	Incrementally reduced: Significant/mitigated impact to 32 Engelmann Oaks.	Same as Reduced Alt. I: Significant/mitigated impact to 32 Engelmann Oaks.
Impact 2.2i: Significant/mitigated indirect noise impacts to the California Gnatcatcher.	Incrementally reduced: Significant/mitigated indirect noise impacts to the California Gnatcatcher.	Same as Reduced Alt. I: Significant/mitigated indirect noise impacts to the California Gnatcatcher.
Impact 2.2j: Significant/mitigated indirect noise impacts to nesting raptors.	Incrementally reduced: Significant/mitigated indirect noise impacts to nesting raptors.	Same as Reduced Alt. I: Significant/mitigated indirect noise impacts to nesting raptors.

BIOLOGICAL RESOURCES (continued)		
PROPOSED PROJECT	REDUCED PROJECT ALTERNATIVE 1	REDUCED PROJECT ALTERNATIVE 2
Impact 2.2k: Significant/unmitigated impact related to a conflict with the MSCP/BMO (edge effects).	Not significant.	Not significant.
Impact 2.2l: Significant/unmitigated impact related to a conflict with the MSCP/BMO (wetlands).	Not significant.	Not significant.
Impact 2.2m: Significant/unmitigated impact related to a conflict with the MSCP/BMO (habitat).	Not significant.	Not significant.
Impact 2.2n: Significant/unmitigated impact related to a conflict with the MSCP/BMO (corridor).	Not significant.	Not significant.
Impact 2.2o: Significant/unmitigated impact related to a conflict with the RPO (sensitive habitat).	Not significant.	Not significant.
Impact 2.2p: Significant/unmitigated impact related to a conflict with the RPO (wetlands).	Not significant.	Not significant.

Note: 1 = Impacts as calculated in previous versions of this report and not reflective of the 2007 Fire Protection Plan requirements are shaded to indicate that the Preferred Plan is not an approvable project.

2 = Includes impacts from wetland creation site.

Source: BRG Consulting, Inc., 2008

TABLE 4-2
Alternatives Comparison of BMO Required Mitigation and Open Space Constituents

Habitat Tier	Vegetation Community	Proposed Project			Reduced Alternative I/II		
		Impact	Required Mitigation	Open Space Easement	Impact	Required Mitigation	Open Space Easement
I	Southern Willow Scrub	0.00	0.00	0.67	0.00	0.00	0.~~30~~74
I	Emergent Wetland	0.00	0.00	0.01	0.00	0.00	0.01~~0~~
I	Southern Coast Live Oak Riparian Forest	2.00[1]	4.00[2]	~~15.05~~14.59	1.36[1]	2.72[1~~2~~]	~~16.21~~25.67
I	Coast Live Oak Woodland	7.29	14.58[2]	~~3.84~~4.00	~~6.85~~7.96	~~13.70~~15.92[1~~2~~]	~~2.72~~3.68
	~~Oak Woodlands~~Tier I Habitats Subtotal	9.29	18.58	19.~~57~~27	~~8.21~~9.32	~~16.42~~18.64	~~18.48~~30.10
I	Mafic Southern Mixed Chaparral	0.00	0.00	6.46	0.00	0.00	6.4~~26~~
II	Diegan Coastal Sage Scrub	13.12	19.68	0.0~~51~~	12.29~~18~~	18.44~~27~~	4.~~23~~65
II	Coastal Sage-Chaparral Scrub	9.26	13.89	~~29.07~~28.85	8.18	12.27	~~26.89~~30.51
	Scrub & Tier I Chaparral Subtotal	22.38	33.57	35.~~54~~36	20.47~~36~~	30.71~~54~~	~~31.12~~41.58
III	Southern Mixed Chaparral	37.36	37.36	~~53.25~~223.19	~~32.88/31.91~~ 36.73	~~32.88/31.91~~3 6.73	~~51.33~~218.40
III	Non-native Grasslands	12.~~33~~[1]~~45~~[2]	6.~~17~~[1]~~22~~[2]	0.~~36~~23	12.~~29~~[1]41[2]	6.21[2]~~15~~[1]	0.4~~2~~81
	Tier III Habitats Subtotal	49.69	~~49.69~~45.58	~~53.61~~223.42	~~45.17~~/ ~~44.20~~49.14	~~39.03/38.06~~4 2.94	~~51.75~~319.21
IV	Disturbed	9.52	0.00	0.~~25~~72	9.37~~08~~	0.00	~~0.32~~3.43
IV	Urban/Developed	4.73	0.00	0.03	4.72	0.00	0.~~03~~17
	Tier IV Habitats Subtotal	14.25	0.00	0.~~28~~75	~~13.8~~14.09	0.00	~~0.35~~3.60
	TOTAL	~~95.61~~ 97.37	~~95.68~~95.73	~~109.00~~278.80	~~87.54/86.57~~ 93.02	~~85.99/85.02~~9 2.29	~~102.00~~394.49

Notes: ~~[1] Includes impacts and mitigation from wetland creation site.~~
[2]~~[1]~~ Includes impacts and mitigation for oak impacts within 25 foot buffer.
[2] Includes impacts and mitigation from wetland creation site.
Source: Merkel & Associates, 2003.

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5.0 LONG-TERM ENVIRONMENTAL EFFECTS

No changes to this section have been made since the February 2005 Draft EIR. Therefore, this section is not provided in this Revised Draft EIR.

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6.0 ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 6.0 Environmental Effects Found Not to be Significant has been revised to incorporate a discussion of the Fire Protection Plan prepared for the Salvation Army Divisional Camp and Retreat. This discussion has been incorporated into the Fire Protection section of the Public Services discussion of *Section 6.0 Environmental Effects Found Not to be Significant*.

ERRATA to EIR CHAPTER 6.0 ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT:

6.2.4 Public Services (Page 6-18)

6.2.4.2 Fire Protection

The Ramona Fire ~~Protection District~~ Department (RF~~P~~D) boundaries correspond to the Ramona Municipal Water District's (RMWD) service boundaries, which serves roughly 22,000 people located in the Town Center, San Diego Country Estates, the Highland Valley region, and various other outlying areas. RF~~P~~D currently operates three stations that could serve the site, depending on the type of response necessary. The closest RF~~P~~D station that serves the property site is Station 82, located at 3410 Dye Road. Station 82 has a minimum of ~~11~~ three firefighters on call at all times and has one Type III Engine. The RF~~P~~D has indicated that the average emergency response time is approximately seven to ten minutes. Station 82 is located approximately 2.4 miles from the project site's access gate, or 3.7 miles from the primary site parking lot. The structures proposed on the project site do not exceed height limits above which a ladder truck would be required. According to the RFD Fire Marshal, the RFD's existing and planned fire protection facilities are currently adequate or will be adequate to serve the proposed project. The expected emergency travel time to the project site is approximately 4.5 minutes (FPP, 2007). The RFD is under contract with Cal Fire. Secondary response would be provided from other RFD Fire Stations as needed. Cal Fire's Mt. Woodson Station, a "Cal Fire Schedule B Station," includes one Type I engine with three personnel at all times. The Mt. Woodson Station also has two engines and engine companies scheduled for peak fire season, April 15th to December 1st of each year. Mutual aid agreements are in place and would include Cal Fire's air attack capabilities, if necessary. ~~The California Division of Forestry and the U.S. Forest Service protect regions not within RFPD's boundaries. These two agencies primarily handle wildland fires, and jointly operate a fire response base at the Ramona Airport.~~

The Project Facility Availability Form provided by the Ramona Fire Department Fire Marshall (June 2006) provides Fire Department input regarding response time. The form states that "Based on the capacity and capability of the District's existing and planned facilities, fire protection facilities are currently adequate or will be adequate to serve the proposed project. The expected emergency travel time to the proposed project is 4 1/2 minutes." According to calculations, the linear distance of 19,536 feet from Fire Station No. 82 to the Camp's entrance would require an average response speed of just less than 50 mph for a 4.5-minute response time. It is estimated that average speed would be closer to 40 mph, resulting in an estimated response time of 5.5 minutes.

Estimated Calls and Demand for Service from the Project

Using San Diego County fire agencies' estimate of 82 annual calls per 1,000 population, the Project's estimated 641 maximum visitors and guests (under Alternative I), which will vary throughout the year and will likely average 150 throughout the course of the year, would generate up to 13 calls per year (less than 0.04 calls per day), 85 percent of which (11 per year) are expected to be medical-related calls. Over the last three years, there have been no fire calls and an estimated nine medical-related calls (pers. comm., D. Patton, October 2007) or three per year. This is based on an average population of approximately 50 people at the Camp over this time frame and compares favorably with the projected demand associated with the Camp expansion.

Response Capability Impact Assessment and Mitigation

It is anticipated that the fire-related calls will decrease while medical-related calls would increase slightly. Service level requirements are not expected to be significantly impacted with the increase of less than 0.04 calls per day for a station that currently responds to just over one call per day in its primary service area. Therefore, the project is not expected to cause a decline in the RFPD response times. The requirements described in the proposed FPP are intended to aid firefighting personnel and minimize the demand placed on the existing emergency service system.

~~Firefighters will also have the ability to helicopter "drop" in personnel at the main site open fields of the camp.~~ A FPP has been prepared for the proposed project. The Camp will implement fire safety requirements included in the FPP ~~In~~ in order to help prevent the spread of wildfires to camp buildings. ~~a 100-foot fore-clearance zone will implemented around all new structures. Additionally, sprinklers would be installed in all existing and new buildings.~~

The proposed project includes annexation of a 10.8-acre parcel located in the north-central portion of the project site where the educational camp is proposed. Should this parcel not be annexed, it would fall within the jurisdiction of the ~~California Department of Forestry and Fire Protection (San Diego Unit)~~Cal Fire with the remaining project site under the jurisdiction of the ~~Ramona Fire Protection District~~RFD. Pursuant to discussions with these agencies, it was noted that either protection service has adequate facilities to serve the project and that no additional fire protection equipment or personnel would be required. The project would not require the expansion of existing fire protection facilities or the development of new facilities. As such, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities.

7.0 LIST OF REFERENCES

The *List of References* section has been included in the RDEIR with changes from the February 2005 DEIR shown in strike-out/underline format:

APCD Website, 2000

Air Pollution Control District, *http://www.sdapcd.co.san-diego.ca.us*, April 2000.

ASM, July 2001

Cultural Resources Significance Evaluation, prepared by ASM Affiliates, July 2001.

ASM, March 2001

Cultural Resources Survey for the Salvation Army's proposed Water Tank and Campgrounds Installation, prepared by ASM Affiliates, March 2001.

ASM, February 1999

Results of the Sierra Del Mar Salvation Army Survey, prepared by ASM Affiliates, February 1999.

Bowman, R., 1973

Soil Survey San Diego Area, California. Parts I and II including maps. U.S. Department of Agriculture, Soil Conservation and Forest Service, *et al.* December.

BRG Consulting, Inc., 1997.

Environmental Opportunities and Constraints Analysis for the Salvation Army's Sierra del Mar Campground.

California Government Code, Section 65450-65457.

County of San Diego, 2001

Waste Discharge Requirements for Discharges of Urban Runoff from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds of the County of San Diego, the Incorporated Cities of San Diego County and the San Diego Unified Port District. Order No. 2001-01; NPDES No. CAS0108758.

County of San Diego General Plan.

Part I Open Space Element, April 2000.

Part II Regional Land Use Element, April 2000.

Part III Circulation Element, July 1994.

Part IV Recreation Element, October 1993.

Part V Seismic Safety Element, April 1991.

Part VI Scenic Highway Element, December 1986.

Part VII Public Safety Element, January 1975.

Part VIII Noise Element, December 1980.

Part X Conservation Element, April 2000.
Part XI Energy Element, 1990.
Part XII Public Facility, October 1993.

County of San Diego Hazardous Establishment Listing Search:
http://www.co.san-diego.ca.us/deh/permits2/estdetail.asp
(Establishment Number: H35642, April 2000).

County of San Diego, 2000
County of San Diego, Department of Planning and Land Use, *Air Quality Analysis Format Guidelines*, December 2000.

County of San Diego, 1997
Multiple Species Conservation Program: County of San Diego Subarea Plan, 1997.

County of San Diego, 1996
County of San Diego Integrated Waste Management Plan, Countywide Summary Plan, Prepared by Department of Public Works Solid Waste Division, Final Draft Revised February 23, 1996.

County of San Diego, 1995
Part XIV, *Ramona Community Plan*, San Diego County General Plan, Prepared by County of San Diego, Adopted October 5, 1978, Amended January 11, 1995.

County of San Diego, 1993
Ramona Design Guidelines. San Diego County General Plan, Prepared by County of San Diego and approved November 3, 1993.

County of San Diego, 1986
Part VI, *Scenic Highway Element, San Diego County General Plan*, Prepared by County of San Diego, Adopted January 9, 1975; Amended December 10, 1986.

County of San Diego, 1978
County of San Diego Zoning Ordinance, Prepared by Department of Planning and Land use.

County of San Diego, Ramona Community Plan, 1995.
Part XIV, Ramona Community Plan, San Diego County General Plan, Prepared by County of San Diego, Adopted October 5, 1978, Amended January 11, 1995.

County of San Diego, Ramona Design Guidelines, 1993.
Ramona Community Planning Area. San Diego County General Plan, Prepared by County of San Diego and approved November 3, 1993.

Dickman, 2001

Comments made on the biological section of the second iteration Draft EIR and the Biological Report, October 8, 2001.

Dudek, 2008

Salvation Army Divisional Camp Fire Protection Plan, April 2008

Forward, 1966

Proprietor of Wildwood Ranch, Salvation Army History, 1966.

Freeborn, 1966

First Presbyterian Church of San Diego, Salvation Army History, 1966.

Fuscoe Engineering, 2003

Stormwater Management and Maintenance Plan (SWMP) for Salvation Army Divisional Camp and Retreat Center, June 25, 2003

Gordon Bricken and Associates, 2004

Environmental Noise Analysis Salvation Army Divisional Camp and Retreat, prepared by Gordon Bricken and Associates, September 25, 2004.

Hart, E.W., 1988

Fault-Rupture Hazard Zones in California, Alquist-Priolo Special Studies ones Act of 1972 with Index to Special Studies Zones Maps. Department of Conservation, Division of Mines and Geology. Sacramento, California.

Integrated Waste Management Board, 2001.

Facility/Site Summary Details, Ramona Landfill. http://www.ciwmb.ca.gov. Visit July 16, 2001.

Jacob, Dianne, 2000

Listing of Mussey Grade Road on the California Register of Historical Resources, prepared by Dianne Jacob San Diego County Board of Supervisors, December 12, 2000.

Jennings, C., 1994

An Explanatory Text to Accompany the Fault Activity Map of California and Adjacent Areas. With Locations and Ages of Recent Volcanic Eruptions. California Department of Conservation, Division or Mines and Geology Publications and Information. Sacramento, California.

June 2006

Project Facility Availability Forms provided by the Ramona Fire Department Fire Marshal, June 2006.

Koehler, C. S., Hunt, R. H., Froelich, D., and J. Geiger, Updated.
Protecting Trees when Building on Forested Land. Cooperative Extension University of California Division of Agriculture and Natural Resources Leaflet 21348 11 pp.

Linscott Law and Greenspan (LLG), 2005
Traffic Impact Analysis, prepared by Linscott, Law and Greenspan Engineers, January 20, 2005.

Matalon Architecture and Planning, February 2003
Conceptual site plans for the Proposed Salvation Army Sierra del Mar Divisional Camp and Retreat.

Merkel and Associates, ~~2005~~2008
Salvation Army Camp and Retreat Biology Report, prepared by Merkel and Associates, ~~January 17, 2005~~April 2008.

Nasland Engineering, 2001
Steep Slopes Analysis for the Salvation Army Sierra del Mar Divisional Camp and Retreat.

Ramona Unified School District, 2000
Annual Report to the Community. http://www.ramona.k12.ca.us/. Visit July 16, 2001.

Saunders, Jenan, 1999
California Register of Historical Resources Questions and Answers. Office of Historic Preservation, California Department of Parks and Recreation. February 1999.

SDAPCD, 1992
San Diego Air Pollution Control District, Assembly Bill 1817.

State of California, 2002
State of California, California Environmental Quality Act, Public Resources Code.
State of California, California Environmental Quality Act, California Code of Regulatins, Title 14, Chapter 3.

U.S. Department of Justice Coordinating Council on Juvenile Justice and Delinquency Prevention, 1996.
Combating Violence and Delinquency: The National Juvenile Justice Action Plan.
http://www.ncjrs.org/txtfiles/jjplanfr.txt. Visit July 12, 2001.

U.S. Environmental Protection Agency. 1995
Compilation of Air Pollutant Emission Factors, AP-42.

USGS, 1962
Geologic Map of California, San Diego - El Centro Sheet, 1962.

Union of Concerned Scientists. 2002

Diesel Engines and Public Health. http://www.ucsusa.org/vehicles/diesel.health.html. Visit 6/18/02.

Update of Mineral Land Classification, 1996

Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1996.

Vinje and Middleton Engineering, Inc., June 2001

Proposed On-site Wastwater Disposal System Plans, June 2001.

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8.0 LIST OF EIR PREPARERS AND PERSONS AND ORGANIZATIONS CONTACTED

The *List of EIR Preparers and Persons and Organizations Contacted* section has been included in the RDEIR although no changes from the February 2005 DEIR have occurred.

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During preparation of this EIR, the following individuals and organizations were contacted regarding current conditions, potential environmental impacts, and project information.

Dare, R.

Personal Communication, Richard Dare. Integrated Waste Management Board, 2001.

Dickman, D.

Personal Communication, Dawn Dickman. County of San Diego, Department of Land Use, Staff Biologist January 23, 2002.

Dickman, D.

Personal Communication, Dawn Dickman. County of San Diego, Department of Land Use, Staff Biologist 2000.

Delgadillo, S.

Personal Communication, Fire Marshal Steve Delgadillo. Ramona Fire Department, April 2000.

Kingdig, L.

Personal Communication, Larry Kingdig. San Diego Gas & Electric. April 2000.

Moser, B.

Personal Communication, Bill Moser, Nasland Engineering, 2001.

Ortiz, N.

Personal Communication, Nick Ortiz. County of San Diego, July 2001.

Patton, D.

Personal Communication, Dave Patton. Salvation Army Divisional Camp and Retreat, April 2000, ~~and~~ November 2003 and October 2007.

Porter, T.

Personal Communication, Thom Porter, Unit Forester, California Department of Forestry and Fire Prevention, January 2002.

Rodriguez L.

Personal Communication, Sergeant Lillian Rodriguez, Ramona Sheriff Department, April 2000.

Rodriguez, L.

Personal Communication, Sergent Lillian Rodriguez, Ramona Sheriff Department, February 2001.

Scholl, R.

Personal Communication, Robert Scholl. Ramona Municipal Water District. March 2000.

9.0 LIST OF MITIGATION MEASURES AND ENVIRONMENTAL DESIGN CONSIDERATIONS

Section 9.0 List of Mitigation Measures and Environmental Design Considerations has been revised to reflect the revised Mitigation Measure 2.3.b regarding Hazards and Hazardous Materials as discussed in detail in *2.3 Hazards and Hazardous Materials*. The Hazards and Hazardous Materials discussion of the Design Considerations was revised to incorporate discussion of the Fire Protection Plan, prepared for the Salvation Army Divisional Camp and Retreat, based on the site layout described in Alternative I. Also, Mitigation Measure 2.2.c and 2.2d & e were modified to reflect the revised wetland and upland impacts. Mitigation Measure 2.2.f & g was modified to reflect the increase in the proposed open space configuration.

ERRATA to EIR CHAPTER 9.0 LIST OF MITIGATION MEASURES AND ENVIRONMENTAL DESIGN CONSIDERATIONS:

9.1.2 Biological Resources (page 9-2)

Mitigation Measures

The following mitigation measures will reduce the impacts to below a level of significance.

Vegetation Communities

A. Tier I Habitats

1. Coast Live Oak Woodlands and Southern Coast Live Oak Riparian Forest

The proposed project would impact 7.29 acres of Coast Live Oak Woodlands and two acres of Southern Coast Live Oak Riparian Forest. The BMO, requires a 2:1 mitigation ratio if the mitigation site meets the criteria for a BRCA. Existing on-site oak woodlands meet the BMO BRCA criteria. Based on the total oak woodland impacts for the proposed project, 18.58 acres of oak woodlands (Tier 1 habitats) would be required to mitigate impacts to a level below significance (Tables 2.2-1 and 2.2-2).

MM 2.2.a & b — Within the proposed dedicated open space easement, 18.89 acres of oak woodland (15.05 acres Southern Coast Live Oak Riparian Forest, and 3.84 acres Coast Live Oak Woodland) shall be preserved.

2. Non-Wetland Waters of the U.S.

The proposed project would impact 0.~~14~~ 17 acre of Non-Wetland Water of the U.S. The BMO, requires a 2:1 mitigation ratio (Table 2.2-1). Creation would occur in the proposed dedicated open space easement in the northern portion of the project site within Non-Native Grassland habitat adjacent to riparian areas associated with the West Fork of San Vicente Creek (Figures 2.2-1 through 2.2-12 ~~2.2-2~~). A conceptual wetland restoration plan has been submitted to the County. The plan includes specifications, planting plans, maintenance and monitoring actions, and success criteria. County approval of the conceptual

wetland restoration plan is required prior to approval of the Major Use Permit associated with the proposed project.

MM 2.2.c Within the proposed dedicated open space easement in the northern portion of the site within the Non-Native Grassland habitat adjacent to riparian areas associated with the West Fork of the San Vicente Creek, 0.3936 acre of wetland habitat shall be created in accordance with a wetland restoration plan approved by the County.

B. Tier II Habitats

1. Diegan Coastal Sage Scrub and Coastal Sage-Chaparral Scrub

The proposed project would impact 13.12 acres of Diegan Coastal Sage Scrub and 9.26 acres of Coastal Sage-Chaparral Scrub. The BMO, requires a 1.5:1 mitigation ratio for impacts to these vegetation communities. As such, preservation of 33.57 acres of on-site sage scrub would reduce this impact to below a level of significance.

MM 2.2.d & e Within the proposed dedicated open space easement 35.3654 acres of sage scrub (6.46 acres of Mafic Southern Mixed Chaparral [a Tier I habitat], 0.0501 acre of Diegan Coastal Sage Scrub, and 29.0728.85 acres of Coastal Sage-Chaparral Scrub) shall be preserved.

Although other areas of Diegan Coastal Sage Scrub or Coastal Sage-Chaparral Scrub could be added to the proposed open space in lieu of up-tiering to use Mafic Southern Mixed Chaparral, the areas are not preferable due to their location adjacent to proposed development, isolation through existing disturbance, and/or disjunct location relative to the proposed open space easement. The Mafic Southern Mixed Chaparral is expected to have similar biological values and functions to Coastal Sage-Chaparral Scrub and would generally be used by the same suite of species.

C. Tier III Habitats

1. Southern Mixed Chaparral

The proposed project would impact 37.36 acres of Southern Mixed Chaparral. The BMO, requires a 1:1 mitigation ratio for impacts to Southern Mixed Chaparral. As such, preservation of 37.36 acres of Southern Mixed Chaparral would reduce this impact to below a level of significance.

2. Non-native Grasslands

The proposed project would impact 12.33 45 acres of Non-native Grasslands. The BMO, requires a 0.5:1 mitigation ratio for impacts to Non-native Grassland. As such, preservation of 6.176.32 acres of Non-native Grassland would reduce this impact to below a level of significance.

MM 2.2.f & g Within the proposed dedicated open space easement, 53.61223.42 acres of Tier III habitat (53.25223.19 acres of Southern Mixed Chaparral and 0.36 0.23 acre of Non-native Grassland) shall be preserved.

By preserving ~~53.61~~223.42 acres of Tier III habitat comprised of ~~53.25~~223.19 acres of Southern Mixed Chaparral and 0.36 acres of Non-native Grassland in the open space easement, impacts to Tier III habitats would be reduced to less than significant.

Sensitive Plant Species

The proposed project would impact 38 Englemann Oaks, nearly all of which are located within the larger Coast Live Oak habitat.

MM 2.2.h Engelmann Oaks (Group D) shall be preserved through on-site preservation of oak woodlands in the proposed dedicated open space easement.

This mitigation approach complies with the BMO's direction that impacts to Engelmann Oak species in Groups C and D be protected using habitat-based mitigation. With on-site preservation of Engelmann Oaks in accordance with the BMO, impacts to this species would be reduced to below a level of significance.

Sensitive Wildlife Species

MM 2.2.i Construction activities shall be prohibited during the California gnatcatcher breeding season (March 1 - July 1) unless nest monitoring is conducted by a qualified biologist and results indicated the absence of active nests or the completion of the breeding season.

MM 2.2.j Prior to construction within 300 feet of potential raptor nesting habitat (i.e., riparian or woodland habitat) to be conducted during the raptor breeding season (February 15 through June 1), the area within 300 feet of the construction footprint shall be surveyed for the presence of nesting raptors. If active nests are present, construction within 300 feet of the active nest will be delayed until the ~~conclusion of the breeding season~~nest is abandoned.

9.1.3 Hazards and Hazardous Materials (page 9-3)

MM 2.3.a Removal of the two above-ground fuel storage tanks shall comply with all applicable federal, state and local regulations. Any necessary permits shall be obtained prior to removal and relocation. An amendment to the Business Plan shall be approved prior to relocation of the above-ground storage tanks. ~~A preliminary Phase I~~ An Environmental Site Assessment (ESA) will be performed to test for potential soil contamination from the tanks in the existing maintenance yard. The Salvation Army will follow all recommended remediation measures outlined in the ~~Phase I~~ ESA. In addition, the Salvation Army will consult with the Ramona Fire Department prior to relocating the tanks for appropriate approval of the new tank location (pers. comm., Delgadillo, S. Ramona Fire Department, April 2000). The new tank location shall be limited to existing developed areas within the project site.

MM 2.3.b The Fire Protection measures and requirements, as identified in the Salvation Army Divisional Camp Fire Protection Plan (Dudek, October 2008) shall be implemented.

The following conditions shall be included in the Major Use Permit to mitigate for Hazards and Public Safety impacts related to potential fires in the project area.

- The Ramona Fire Department determined that a 260,000-gallon water tank at an elevation of approximately 1,665 MSL with a ten-inch on-site water line that connects to the existing six-inch water main in Mussey Grade Road will meet fire flow requirements for the project and will also enhance the flow capacity to fight future fires in the project area. Prior to issuance of building permits, the applicant shall submit to the County, plans approved by the Ramona Municipal Water District Engineering Department for a water system capable of handling the fire flow requirements for the project (existing and proposed buildings).
- Prior to the issuance of building permits the appropriate number of fire hydrants and their specific locations, approved by the ~~Ramona Fire Department~~RMWD, will be identified and constructed.
- Automatic sprinklers shall be installed in all existing and new buildings, consistent with the Ramona Fire Code Ordinance 99-199. This shall be ~~determined after~~verified when the water system plans are approved.
- All on-site roads shall be improved to a minimum 24-foot width with paved surfacing, with the exception of those designated as "existing access road to remain, road not to be paved," (item #4), and "existing road width to remain, road to be paved," as shown on the "Fire Marshal Exhibit: Proposed Site Plan," dated 1/15/02, and revised 4/18/02, and 5/1/02 (Appendix H)
- A lighted map directory shall be provided at every intersection within the proposed project denoting, with numbers, the areas on-site that the particular road leads to.
- "No Parking Fire Lane" signs shall be posted on all roads that have the fire department required width of 24 feet. The number of signs and their placement shall be determined by the Ramona Fire Department.
- A fuel modification zone a minimum of 100 feet in width will be provided around the entire perimeter of each building site, as depicted on the site plan, consistent with Ramona Fire Code Ordinance 99-199.
- A ten-foot wide fuel modification zone shall ~~occur~~ be provided along each side of all fire access roadways.
- The following are exceptions to the fuel modification requirements above ~~are granted per the Fire Code~~:
  - Single specimens of trees, ornamental shrubbery or similar plants used as ground

covers, provided that they do not form a means of rapidly transmitting fire from the native growth to any structure.

- Grass and other vegetation located more than 30 feet from buildings or structures and less than 18 inches (457 mm) in height above the ground need not be removed where necessary to stabilize the soil and prevent erosion.

- With the approval of the fire authority having jurisdiction, the width of the fuel modification zone may be reduced where fire-resistive structures or other features are constructed. However, in no case shall the fuel modification zone be reduced to less than 30 feet.

- Prior to issuance of building permits, a fire alarm system shall be provided.

- A response map update in a format compatible with current department mapping shall be provided, as specified in the Ramona Fire Code Ordinance 99-199.

- The Salvation Army shall, at all times, have two large capacity school buses with drivers or other equivalent vans or buses on the premises at all times when children are attending camp.

- The Salvation Army shall conduct a fire drill the first day of every camp period.

- The ~~Ramona Fire Department~~RMWD has agreed to~~, and shall~~ observe an annual fire evacuation/fire drill exercise to ensure proper safety measures have been implemented. After this annual observation and review, the ~~fire department~~RMWD may require more than two large capacity school buses with drivers to be available at the camp for evacuation purposes. To protect family or adult campers who were transported to the camp by bus or van, the ~~Ramona Fire Department~~RMWD may also require one or more additional buses with drivers to be available to evacuate the campers or may require other protective measures.

- ~~The yurts will have skirting installed in a manner similar to skirting on trailer or mobile homes.~~

9.2 Environmental Design Considerations

9.2.2 Hazards and Hazardous Materials (Page 9-10)

In order to diminish potential fire emergency impacts, the project shall implement the fire safety requirements provided in the Fire Protection Plan (FPP). The FPP includes a combined fire protection system designed for structures on the project site. The fire protection system includes, but is not limited to, customized fuel modification zones with a minimum two times and up to 20 times the width of predicted flame length heights; enhanced, ignition-resistive construction; interior sprinklers, and infrastructural improvements. In addition, the FPP requires water availability and flow would be improved with additional fire hydrants and upgraded water lines throughout the Camp and a 260,000-gallon water tank

fed by the Ramona Municipal Water District. The 260,000-gallon water tank would be placed near the existing 10,000-gallon water tank, which will remain in service. The fire protection system recommended in the FPP would only be possible with the implementation of Alternative I or Alternative II.

In an emergency situation, relocation of the site's campers is the preferred action, but when conditions would risk the safety of relocating campers, a shelter-in-place structure would be utilized to house campers and visitors until the threat has passed. Although all structures on site will include important ignition-resistant construction materials and methods, interior sprinklers, improved water availability, and improved fire department access, as well as customized fuel modification areas designed to reduce fire intensity and spread during wildfire, one large occupancy, the Multipurpose Building, has been identified as a designated shelter-in-place structure for use during wildfire emergencies. The Multipurpose Building offers 19,500 square feet of interior space, which could accommodate up to 1,300 people, over twice the maximum number of camp users allowed onsite at one time under both alternatives. Details on the fire protection system and shelter-in-place structure are provided in the FPP (Appendix J of the EIR). ~~a 260,000-gallon water tank, 60 feet wide and 13 feet high, shall be located next to the existing 10,000-gallon tank in the central area of the project site to provide necessary water flow in the event of a fire emergency.~~ Additionally, ~~all existing and proposed buildings should be retrofitted with fire sprinklers, and~~ removal of Oak trees has been avoided to the maximum extent possible both due to their biological significance and because they do not tend to spread fires.